NOTICE

All drawings located at the end of the document.

Final

No Further Action **Justification Document**

Rocky Flats Plant Low-Priority Sites (Operable Unit 16)

U.S. Department of Energy **Rocky Flats Plant** Golden, Colorado

Environmental Restoration Program

July 1992

Reviewed for Classification/UCNI/OUO By: Janet Nesheim, Derivative Classifier

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ADMIN RECORD

Final

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Mana	ger, Ren	nediation Programs	RFI Project Manag	er
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Manager, Remediation Programs	RFI Project Manager	

EXECUTIVE SUMMARY

The No Further Action Justification document for Operable Unit 16 (OU16) - Low-Priority Sites at the Rocky Flats Plant (RFP) is part of the comprehensive, phased program of site characterization, remedial investigations, feasibility studies, and remedial/corrective actions currently in progress at RFP. These activities are pursuant to the Interagency Agreement (IAG) signed by the U.S Department of Energy (DOE), the U.S Environmental Protection Agency (EPA), and the Colorado Department of Health (CDH).

OU16 contains seven Individual Hazardous Substance Sites (IHSSs) that were grouped together in the IAG because of the likelihood that previous response actions or natural environmental processes at these low-priority sites eliminated the need for further action. In accordance with the U.S. EPA guidance (1989a), a no further action decision is appropriate at sites where a previous removal action or natural environmental processes mitigate risks to human health and the environment. The risks associated with each of the IHSSs in OU16 and the need for further action are assessed using a conceptual model to evaluate the exposure pathways by which human and biotic receptors may be exposed to contaminants.

The No Further Action Justification document for OU16 describes the site history, geology, hydrogeology, climatology, and current and future land use to characterize OU16 within the

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RFP site framework. Each IHSS, its spill history, potential contamination, and remedial action, if performed, are described. Also described is a site conceptual model for OU16 that includes contaminant sources, release mechanisms, transport pathways, exposure routes and receptors. Each IHSS within OU16 is evaluated relative to the conceptual model to determine if it poses a risk to human health or the environment

The seven IHSSs comprising OU16 include IHSS 185 - Solvent Spill; IHSS 192 - Antifreeze Discharge; IHSS 193 - Steam Condensate Leak - 400 Area, IHSS 194 - Steam Condensate Leak - 700 Area; IHSS 195 - Nickel Carbonyl Disposal, IHSS 196 - Water Treatment Plant Backwash Pond, and IHSS 197 - Scrap Metal Sites - 500 Area

Potential risks to human health and the environment associated with historical releases and spills at IHSSs 185, 192, 193, 194, 195, and 197 have been mitigated by past response actions and/or natural attenuation processes that eliminate the source or exposure pathways Therefore, further action is not justified for these six IHSSs

Because a previous removal action has not eliminated the source and natural environmental processes have not prevented release and migration of contaminants, the exposure pathways for IHSS 196 are complete. Therefore, there is potential risk to human health and the environment and further action is warranted for this IHSS.

Further action for IHSS 196 is already scheduled Investigatory action proposed for IHSS 115 in Attachment 2, Table 5 of the IAG (U S DOE, 1991a) represents appropriate further action for IHSS 196 because (1) the area of investigation for IHSS 115 includes IHSS 196, (2) the target analytes for the IHSS 115 investigation include contaminants associated with IHSS 196, and (3) contaminant concentrations associated with IHSS 115 are likely to be

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significantly greater than concentrations associated with IHSS 196. Thus, additional action specific to IHSS 196 is not warranted

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Manager, Remediation Programs	RFI Project Manager	

1.0 INTRODUCTION

This document presents historical information and available data pertaining to the types and extent of contamination/releases and remedial response actions at Operable Unit 16 (OU16) - Low-Priority Sites at the Rocky Flats Plant (RFP) in Jefferson County, Colorado This information is used to determine the need for further action at the seven Individual Hazardous Substance Sites (IHSSs) comprising OU16, listed as follows

IHSS 185	Solvent Spill
IHSS 192	Antifreeze Discharge
IHSS 193	Steam Condensate Leak - 400 Area
IHSS 194	Steam Condensate Leak - 700 Area
IHSS 195	Nickel Carbonyl Disposal
IHSS 196	Water Treatment Plant Backwash Pond
IHSS 197	Scrap Metal Sites - 500 Area

Unlike other operable units at RFP where IHSSs were grouped together in the Interagency Agreement (IAG) on the basis of similar contaminants, release types, and/or location, the IHSSs comprising OU16 were grouped together because of the likelihood that previous remediation efforts and/or natural environmental processes at these low-priority sites eliminated the need for any further remedial response action. In accordance with Guidance

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on Preparing Superfund Decision Documents (U.S. EPA, 1989a), a no further action decision may be warranted at sites where a previous removal action and/or natural environmental processes mitigate threats to human health and the environment

This document is part of a comprehensive, phased program of site characterization, remedial investigations, feasibility studies, and remedial/corrective actions currently in progress at RFP. These investigations are being conducted pursuant to the IAG signed by the US Department of Energy (DOE), the US Environmental Protection Agency (EPA), and the State of Colorado Department of Health (CDH), dated January 22, 1991 (US DOE, 1991a) The IAG program developed by DOE, EPA, and CDH addresses Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) regulations applicable to remedial investigations at OU16

11 ENVIRONMENTAL RESTORATION PROGRAM

The Environmental Restoration (ER) program, designed for investigation and cleanup of environmentally contaminated sites at DOE facilities, is being implemented in five phases. Phase 1 (Installation Assessment) includes preliminary assessments and site inspections to assess potential environmental concerns. Phase 2 (Remedial Investigations) includes planning and implementation of sampling programs to delineate the nature and extent of contamination at specific sites and evaluate potential contaminant migration pathways. Phase 3 (Feasibility Studies) includes evaluation of remedial alternatives and development of remedial action plans to mitigate environmental problems identified in Phase 2 as needing correction. Phase 4 (Remedial Design/Remedial Action) includes design and implementation of site-specific remedial actions selected on the basis of Phase 3 feasibility studies. Phase 5 (Compliance and Verification) includes monitoring and performance

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assessments of remedial actions as well as verification and documentation of the adequacy of remedial actions carried out under Phase 4

1.2 DOCUMENT OVERVIEW

The available information is presented in this document to characterize site physical features, define sources of contamination, identify contaminants of concern, evaluate potential release pathways, document the remedial response cleanup activities, and determine the need, if any, for further action

Section 2.0 (Site Characterization and Background) presents regional and plant site background information, a description of the physical/environmental setting of OU16, and relevant information pertaining to past operational histories or occurrences of contamination. Remedial response cleanup activities performed at the IHSSs are also described. Section 3.0 presents a conceptual model for the units based on the physical characteristics of the IHSSs, potential or known release pathways, and available information regarding the nature and extent of contamination known or potentially associated with each IHSS in OU16. The conceptual model identifies exposure pathways by which human and biotic receptors may be exposed to contaminants. Existing information is used to determine whether the exposure pathway is complete and, therefore, whether the IHSSs pose a risk to human health and/or the environment. Based on the evaluation of the exposure pathway for each of the OU16 IHSSs, the rationale for further action is presented.

Relevant information used in characterizing the OU16 IHSSs and associated remedial responses is presented in Appendices A through C

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2.0 SITE CHARACTERIZATION AND BACKGROUND

21 REGIONAL AND PLANT SITE BACKGROUND INFORMATION

2 1.1 Facility Background and Plant Operations

RFP is a government-owned, contractor-operated facility, which is part of the nationwide Nuclear Weapons Complex The plant was operated for the U.S Atomic Energy Commission (AEC) from its inception in 1951 until the AEC was dissolved in January 1975. At that time, responsibility for the plant was assigned to the Energy Research and Development Administration (ERDA), which was succeeded by DOE in 1977. Dow Chemical U.S.A., an operating unit of the Dow Chemical Company, was the prime operating contractor of the facility from 1951 until June 30, 1975. Rockwell International was the prime contractor responsible for operating RFP from July 1, 1975, until December 31, 1989. EG&G Rocky Flats, Inc. became the prime contractor at RFP on January 1, 1990.

Previous operations at RFP consisted of fabrication of nuclear weapons components from plutonium, uranium, and other nonradioactive metals (principally beryllium and stainless steel) Parts made at the plant were shipped elsewhere for assembly Currently, the plant reprocesses components after they are removed from obsolete weapons for recovery of plutonium. Other activities at RFP include research and development in metallurgy,

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machining, nondestructive testing, coatings, remote engineering, chemistry, and physics. Both radioactive and nonradioactive wastes were generated in the production process Current waste handling practices involve onsite and offsite recycling of hazardous materials, onsite storage of hazardous and low-level radioactive mixed wastes, and offsite disposal of solid low-level radioactive materials at appropriate DOE facilities. However, RFP operating procedures have historically included both onsite storage and disposal of hazardous, low-level radioactive, and low-level radioactive mixed wastes.

2.1.2 Previous Investigations

Various studies have been conducted at RFP to characterize environmental media and to assess the extent of radiological and chemical contaminant releases to the environment. The investigations performed prior to 1986 were summarized by Rockwell International (1986a). Investigations characterized the regional geology and sitewide surface water and ground water hydrogeology. Ecological and public health studies were also conducted.

In 1986, two investigations were completed at the plant. The first was the DOE Comprehensive Environmental Assessment and Response Program (CEARP) Phase 1 Installation Assessment (US DOE, 1986), which included analysis and identification of current operational activities, active and inactive waste sites, current and past waste management practices, and potential environmental pathways through which contaminants could be transported. A number of sites that could potentially have adverse impacts on the environment were identified. These sites were designated as Solid Waste Management Units (SWMUs) by Rockwell International (1987). In accordance with the IAG, SWMUs are now referred to as IHSSs.

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The second investigation completed at the plant in 1986 involved a hydrogeologic and hydrochemical characterization of the plant site. Plans for this study were presented by Rockwell International (1986b and 1986c), and study results were reported by Rockwell International (1986d)

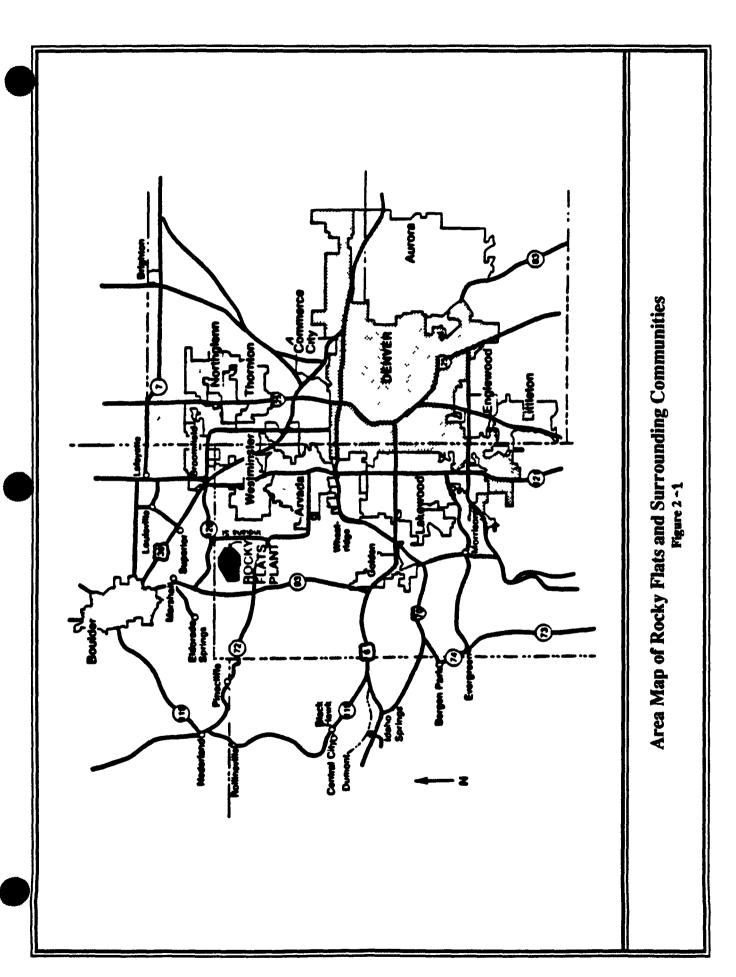
22 PHYSICAL SETTING

2.2.1 Location

RFP is located northwest of Denver in northern Jefferson County, Colorado (Figure 2-1). Other surrounding cities include Boulder, Broomfield, Westminster, and Arvada, all of which are located less than 10 miles to the northwest, northeast, east, and southeast, respectively RFP occupies approximately 6,550 acres of federal land in Sections 1 through 4 and 9 through 15 of T2S, R70W, 6th Principal Meridian Most plant structures are located within the primary RFP site, which occupies approximately 400 acres RFP is surrounded by a buffer zone of approximately 6,150 acres (Figure 2-2)

RFP is bounded on the north by State Highway 128, on the east by Jefferson County Highway 17 (also known as Indiana Street), on the south by agricultural and industrial properties and Highway 72, and on the west by State Highway 93 (Figure 2-2)

The locations of the seven IHSSs comprising OU16 are shown on Figure 2-3 All of the IHSSs are located within the developed area of the RFP site, except for IHSS 195, the Nickel Carbonyl Disposal site, which is located north of the plant site



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2.2.2 Topography

RFP is located along the eastern edge of the southern Rocky Mountain region, immediately east of the Colorado Front Range. The plant site is located on a broad, eastward-sloping pediment that is capped by alluvial deposits of Quaternary age (Rocky Flats Alluvium) The pediment surface has a fan-like form, with its apex and distal margins approximately 2 miles west of RFP. The tops of alluvial-covered pediments are nearly flat but slope eastward at 50 to 100 feet per mile (EG&G, 1992). At RFP, the pediment surface is dissected by a series of east-northeast trending stream-cut valleys. The bases of the valleys containing Rock Creek, North and South Walnut Creeks, and Woman Creek lie 50 to 200 feet below the elevation of the older pediment surface. These valleys are incised into the bedrock underlying alluvial deposits, but most bedrock is concealed beneath colluvial material accumulated along the gentle valley slopes.

Much of the ground surface in the controlled area of RFP has been disturbed by earthwork construction, thus obscuring original topographic undulations. Typical existing slopes in the controlled area are approximately 2 to 3 percent

2.2.3 Climate

The area surrounding RFP has a semiarid climate characteristic of much of the central Rocky Mountain region. Based on precipitation averages recorded between 1953 and 1976, the mean annual precipitation at the plant is 15 inches. Approximately 40 percent of the precipitation falls during the spring season, much of it as wet snow. Thunderstorms (June through August) account for an additional 30 percent of the annual precipitation. Autumn and winter are drier seasons, accounting for 19 and 11 percent of the annual precipitation,

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respectively. Snowfall averages 85 inches per year, falling from October through May (U S DOE, 1980).

Winds at RFP, although variable, are predominantly from the west-northwest Stronger winds occur during the winter, and the area occasionally experiences chinook winds with gusts up to 100 miles per hour (U.S DOE, 1980)

The climate at RFP is strongly influenced by two flow patterns. During daytime hours, as the earth heats, air tends to flow toward the higher elevations (upslope) The general air flow pattern during upslope conditions for the Denver area is typically north to south, with flow moving up the South Platte River Valley that enters the canyons of the Front Range After sunset, the air against the mountainside is cooled and begins to flow toward lower elevations (downslope) During downslope conditions, air flows down the canyons of the Front Range onto the plains (U.S. DOE, 1980)

Temperatures at RFP are moderate. Extremely warm or cold temperatures are usually of short duration. On average, daily summer temperatures range from 55 to 85 degrees Fahrenheit (°F), and winter temperatures range from 20 to 45°F. Temperature extremes recorded at the plant range from 102°F on July 12, 1971, to -26°F on January 12, 1963. The 24-year daily average maximum temperature for the period 1952 to 1976 is 76°F, the daily minimum is 22°F, and the average mean is 50°F. Average relative humidity is 46 percent (U.S. DOE, 1980).

2.2.4 Surface Water Hydrology

Three intermittent streams that flow generally from west to east drain RFP These drainages are Rock Creek, Walnut Creek, and Woman Creek (Figure 2-2)

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Rock Creek drains the northwestern corner of the buffer zone and flows northeastward through the buffer zone to its offsite confluence with Coal Creek IHSS 195 is located in the Rock Creek drainage (Figure 2-3) North and South Walnut Creeks and Dry Creek drain the northern portion of the plant complex. These three forks of Walnut Creek join in the buffer zone and flow to Great Western Reservoir, approximately 1 mile east of the confluence. Flow is diverted around Great Western Reservoir into Big Dry Creek via the Broomfield Diversion Ditch. Rock Creek, North and South Walnut Creeks, and Dry Creek are intermittent streams. Flow occurs in these streams only after precipitation events and spring snowmelt. An east-west trending interfluve separates Walnut Creek from Woman Creek. Woman Creek, a perennial stream, drains the southern RFP buffer zone and flows eastward into Mower Reservoir. The South Interceptor Ditch, which collects runoff from the southern portion of the plant complex and diverts it to Pond C-2, is located between RFP and Woman Creek.

Retention ponds are located in each of the creeks downstream of the main plant site (Figures 2-2 and 2-3) The four ponds located along North Walnut Creek are designated (from west to east) as A-1, A-2, A-3, and A-4 Currently, Ponds A-1 and A-2 are used only for spill control, and North Walnut Creek stream flow is diverted around them through an underground pipe Until 1980, Ponds A-1 and A-2 were used for storage and evaporation of plant laundry water Pond A-3 receives North Walnut Creek stream flow and runoff from the northern portion of controlled area (and OU16). Pond A-4 is designed for surface water control and for additional storage capacity for overflow from Pond A-3

The five retention ponds located along South Walnut Creek are designated (from west to east) as B-1, B-2, B-3, B-4, and B-5 Currently, Ponds B-1 and B-2 are reserved for spill control Pond B-3 receives treated effluent from the sewage treatment plant Ponds B-4 and B-5 receive surface runoff and occasionally collect discharge from Pond B-3 Pond B-5

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receives runoff from the central portion of RFP (and OU16) and is used for surface water control in addition to collecting overflow from Pond B-4

Ponds C-1 and C-2 (south and east of the plant, respectively) are located along Woman Creek Pond C-1 receives stream flow from Woman Creek. This flow is diverted around Pond C-2 into the Woman Creek channel downstream Pond C-2 receives surface runoff from the South Interceptor Ditch along the southern portion of RFP

Surface water drainage in OU16 (except IHSS 195, located in the Rock Creek drainage basin) is controlled for the most part by water diversion structures such as ditches, pavements, gutters, drains, and culverts Surface water drainage patterns in the controlled area are shown in Figures 2-2 and 2-3. The largest of the runoff control ditches in the controlled area is the Central Avenue Ditch, which runs eastward along Central Avenue and discharges to South Walnut Creek (Pond B-5). The other major runoff control ditch is the South Interceptor Ditch, which prevents runoff from the south side of main RFP complex from entering Woman Creek. This ditch discharges to Pond C-2.

Pond discharges are monitored in accordance with the RFP National Pollutant Discharge Elimination System (NPDES) permit conditions. In addition to NPDES monitoring requirements, offsite pond discharges are monitored for plutonium, americium, uranium, and tritium.

2.2.5 Ecology

The industrialized area at RFP is highly developed for plant operations, and only small fragments of highly disturbed or landscaped habitat currently exist. These fragments are too small to support viable ecosystem functions. Wildlife, particularly birds, use artificial

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structures within the industrial area only transiently and obtain food and water almost exclusively outside this area

A variety of vegetation is found within the buffer zone surrounding RFP Included are species of flora representative of tall-grass prairie, short-grass plains, lower montane, and foothill ravine regions. Riparian vegetation exists in the site's drainages and wetlands. These species of vegetation are not on the endangered species list (EG&G, 1991a). Since acquisition of RFP property, vegetative recovery has occurred, as evidenced by the presence of disturbance-sensitive grass species such as big bluestem (Andropogon gerardu) and side oats grama (Bouteloua curtipendula). One species, Ute Ladies'-tresses (Spiranthes diluvialis), has been identified as a threatened species on the Threatened and Endangered Species list. The plant's habitat has been identified as riparian areas of Colorado, specifically in riparian meadows in the City of Boulder, Boulder County, and along Clear Creek in Jefferson County. RFP is located on a flat that divides two drainages feeding into Boulder County and Clear Creek. The species has not been identified at RFP to date. Vegetative stresses attributable to hazardous waste contamination have not been confirmed (U.S. DOE, 1980)

The fauna inhabiting RFP and its buffer zone consists of species associated with western prairie regions. The most common large mammal is the mule deer (Odocoileus hemionus), with an estimated 100 to 125 permanent residents at RFP. A number of small carnivores, such as the coyote (Canis latrans), red fox (Vulpes fulva), striped skunk (Mephitis mephitis), and long-tailed weasel (Mustela frenata) are also found at RFP. Small herbivores can be found throughout the plant complex and buffer zone, including species such as the pocket gopher (Thomomys talpoides), white-tailed jackrabbit (Lepus townsendu), and meadow vole (Microtus pennsylvanicus) (US DOE, 1980)

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Commonly observed birds include western meadowlarks (Sturnella neglecta), horned larks (Eremophila alpestris), mourning doves (Zenaidura macroura), vesper sparrows (Pooecetes gramineus), western kingbirds (Tyrannus vociferans), black-billed magpies (Pica pica), American robins (Turdus migratorius), and yellow warblers (Dendroica magnolia). A variety of ducks, killdeer (Charadrius vociferus), and red-winged blackbirds (Agelaius phoeniceus) are seen in areas adjacent to ponds Mallards (Anas platyrhynochos) and other ducks (Anas sp) frequently nest and rear young on several of the ponds Common birds of prey in the area include marsh hawks (Circus cyaneus), red-tailed hawks (Buteo jamaicensis), ferruginous hawks (Buteo regalis), rough-legged hawks (Buteo lagopus), and great horned owls (Bubo virginianus) (U.S DOE, 1980) Bald eagles (Haliaeetus leucocephalus) and golden eagles (Aguila chrysaetos) are seen at Rocky Flats as migrants and winter transients

Bull snakes (*Pituophis melanoleucus*) and rattlesnakes (*Crotalus sp*) are the most frequently observed reptiles. Eastern yellow-bellied racers (*Coluber constrictor flaviventris*) have also been noted. The eastern short-horned lizard (*Phrynosoma douglassi brevirostre*) has been reported on the site, but these and other lizards are not commonly observed. The western painted turtle (*Chrysemys picta*) and the western plains garter snake (*Thamnophis radix*) are found in and around many of the ponds (U.S. DOE, 1980)

Two procedures that pertain to identification and management of threatened and endangered species at RFP are currently being prepared by the EG&G National Environmental Policy Act (NEPA) group These are the draft *Identification and Reporting of Threatened and Endangered and Special Concern Species*, Administrative Procedure NEPA.12, Rev 0, and the draft *Protection of Threatened and Endangered and Special Concern Species*, Operations Procedure FO 21, Rev 0

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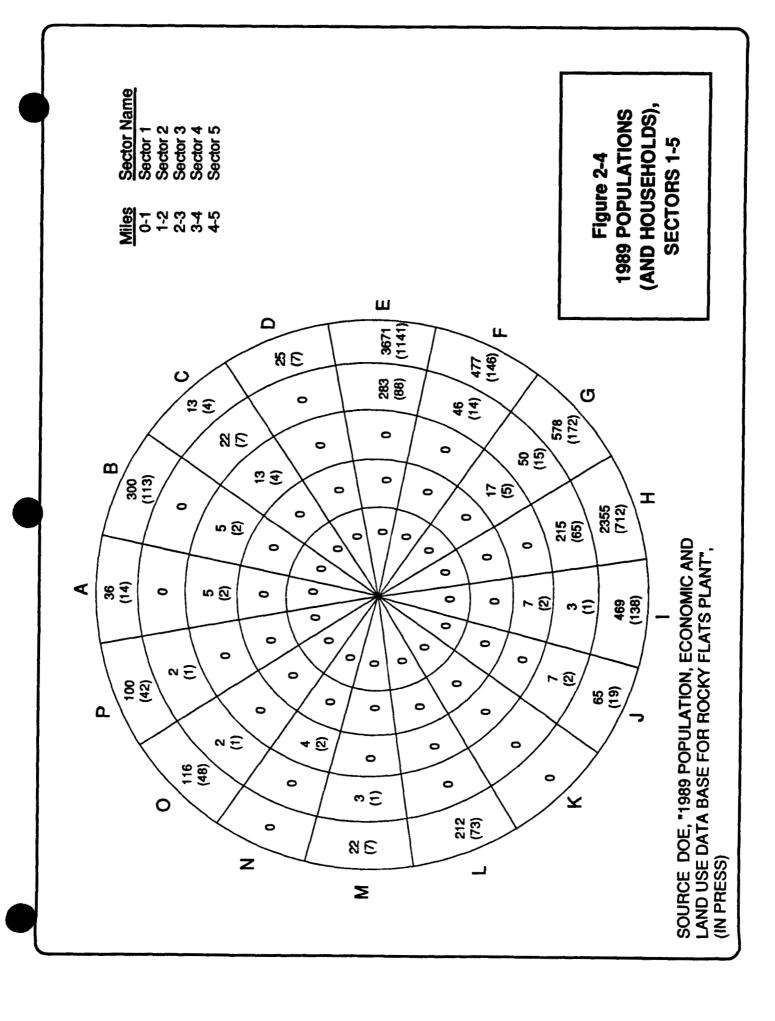
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2.2.6 Surrounding Land Use and Population Density

The population, economics, and land use of areas surrounding RFP are described in a 1989 Rocky Flats vicinity demographics report prepared by DOE (U.S DOE, 1991b) This report divides general use of areas within 0 to 10 miles of RFP into residential, commercial, industrial, parks and open space, agricultural and vacant, and institutional classifications and considers current and future land use near the plant

Most residential use within 5 miles of RFP is immediately northeast, east, and southeast of RFP. The 1989 population distribution within areas up to 5 miles from RFP is illustrated in Figure 2-4. Commercial development is concentrated near residential developments north and southwest of Standley Lake and around Jefferson County Airport, located approximately 3 miles northeast of RFP. Industrial land use within 5 miles of the plant is limited to quarrying and mining operations. Open-space lands are located northeast of RFP near the City of Broomfield and in small parcels adjoining major drainages and small neighborhood parks in the cities of Westminster and Arvada. The west, north, and east sides of Standley Lake are surrounded by Standley Lake Park open space. Irrigated and non-irrigated croplands, producing primarily wheat and barley, are located north and northeast of RFP near the cities of Broomfield, Lafayette, Louisville, and Boulder, and in scattered parcels adjacent to the eastern boundary of the plant. Several horse operations and small hay fields are located south of RFP. The demographic report characterizes much of the vacant land adjacent to RFP as rangeland (U.S. DOE, 1991b)



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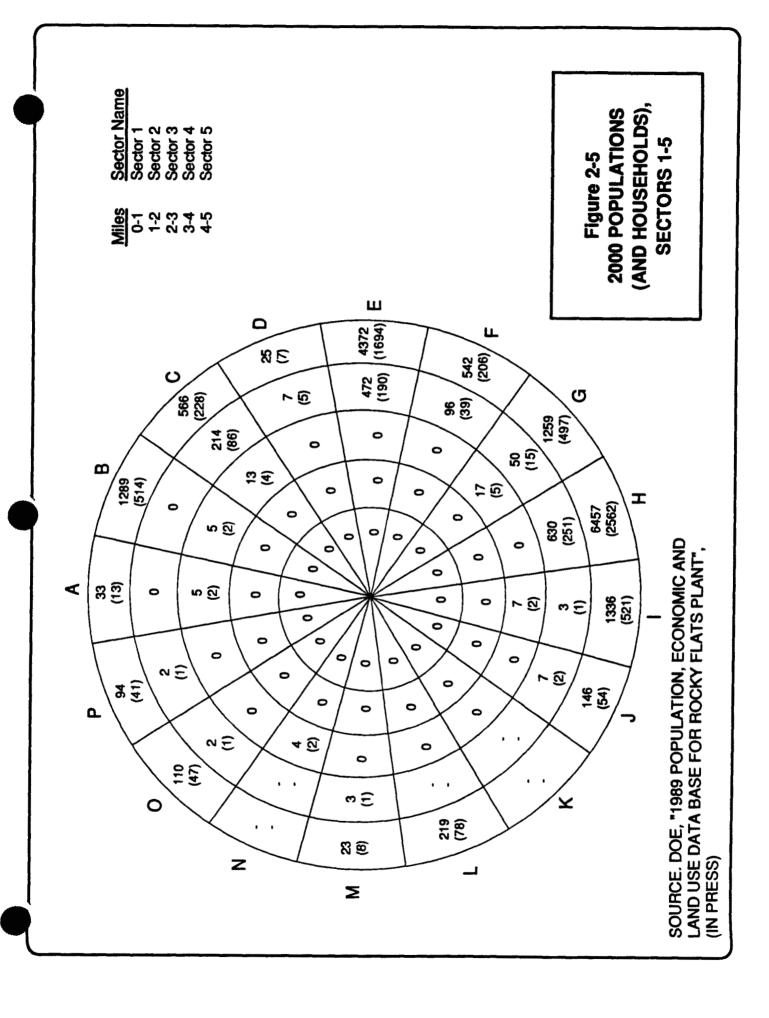
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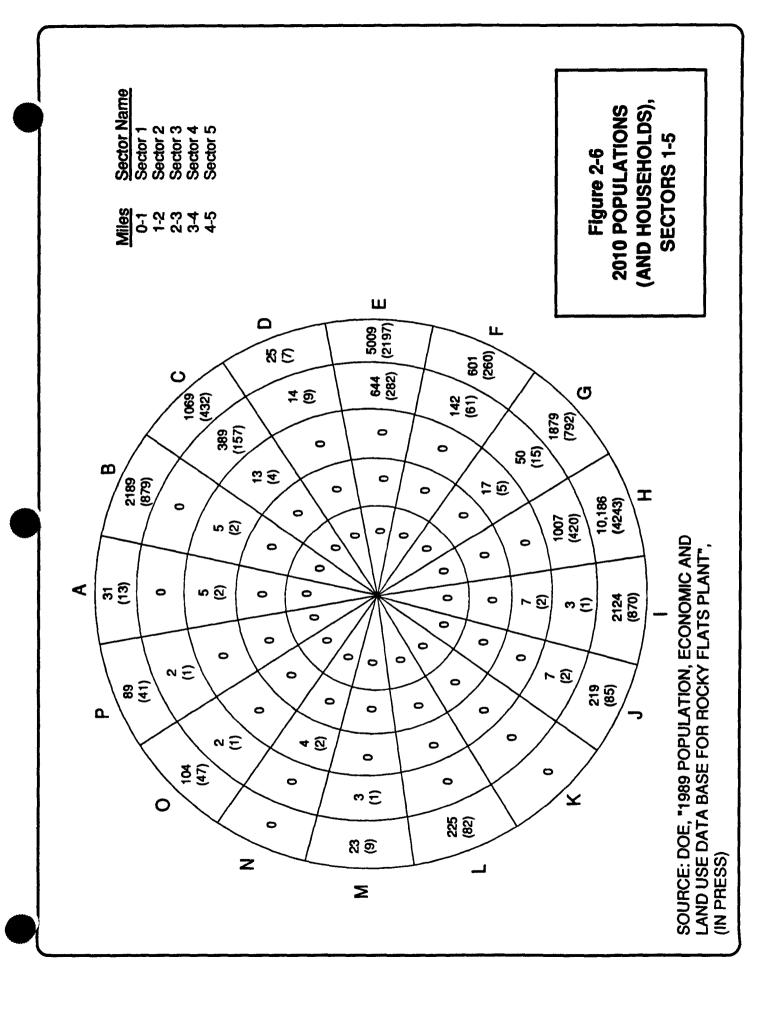
Future land use in the vicinity of RFP most likely involves continued urban expansion, increasing the density of residential, commercial, and perhaps industrial land use in the area. The expected trend in population growth in the vicinity of RFP is also addressed in the DOE demographic study (U.S. DOE, 1991b). The report considers expected variations in population density by comparing the current (1989) setting to population projections for the years 2000 and 2010, thus a 21-year profile of projected population growth in the vicinity of RFP can be examined. DOE's projections are based primarily on long-term population projections developed by the Denver Regional Council of Governments (DRCOG). Expected population density and distribution around RFP for the years 2000 and 2010 are shown in Figures 2-5 and 2-6, respectively

227 Regional Geology

RFP is located on a broad, eastward-sloping pediment surface along the western edge of the Denver Basin. The area is underlain by more than 10,000 feet of Pennsylvanian to Upper Cretaceous sedimentary rocks that have been folded and faulted. Along the foothills west of RFP, sedimentary strata are steeply east-dipping to overturned. On the western side of RFP, Upper Cretaceous strata dip steeply to the east along the western limb of an asymmetrical north-south trending syncline. Immediately west of the plant, steeply dipping sedimentary strata abruptly flatten to less than 2 degrees beneath and east of RFP (EG&G, 1991b). The sedimentary bedrock is unconformably overlain by Quaternary alluvial gravels that cap pediment surfaces of several distinct ages (Scott, 1965).

The local stratigraphic section for the RFP area is shown in Figure 2-7 Upper Cretaceous bedrock units directly underlying RFP and pertinent to plant site hydrogeology include, in descending stratigraphic order, the Arapahoe Formation, the Laramie Formation, the Fox





Age	Formation	Thickness (feet)	
Quaternary	Rocky Flats Alluvium	10-20	/
	Arapahoe Fm	15-25	
Cretaceous	Laramie Formation	upper interval 300-500 lower interval 300	
	Fox Hills Sandstone	90-140)-
	Pierre Shale and older units		^^

Clayey Sandy Gravels - reddish brown to yellowish brown matrix, grayish-orange to dark gray, poorly sorted, angular to subrounded, cobbles, coarse gravels, coarse sands and gravelly clays varying amounts of caliche

Claystones, Silty Claystones, and Sandstone - light to medium olive-gray with some dark olive-black claystone and silty claystone weathers yellowish orange to yellowish brown, a mappable, light to olive gray, medium- to coarse-grained, frosted sandstone to conglomeratic sandstone occurs locally at the base (Arapahoe marker bed)

Claystones, Silty Claystones, Clayey Sandstones, and Sandstones - kaolinitic, light to medium gray claystone and silty claystone and some dark gray to black carbonaceous claystone, thin (2') coal beds and thin discontinuous, very fine to medium-grained, moderately sorted sandstone intervals

Claystones, Sandstones, and Coals - light to medium gray, fine- to coarse-grained, poorly to moderately sorted, silty, immature quartiztic sandstone with numerous lenticular, subbituminous coal beds and seams that range from 2' to 8' thick

Sandstones - grayish orange to light gray, calcareous, fine-grained, subrounded, glauconitic, friable sandstone

U.S. Department of Energy Rocky Flats Plant, Golden, Colorado

Figure 2-7

Generalized Stratigraphic Section for the Central Portion of Rocky Flats Plant

After EG&G, 1992

July 1992

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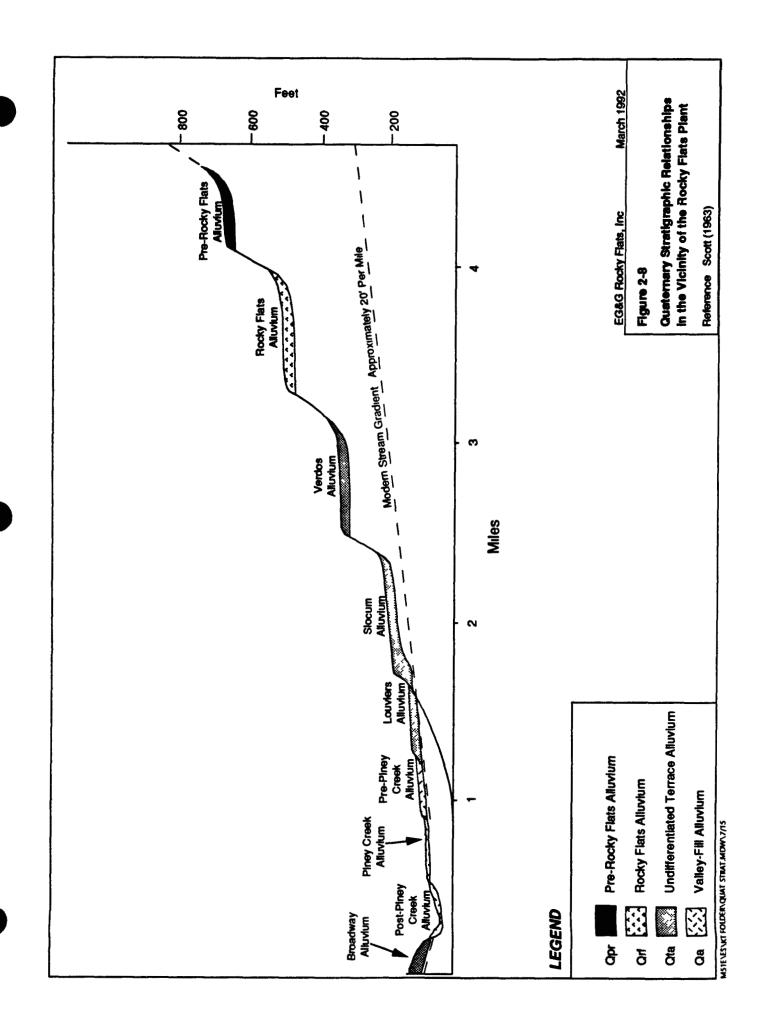
Hills Sandstone, and the Pierre Shale. Surficial deposits at RFP consist of Rocky Flats Alluvium, colluvium, valley-fill alluvium, disturbed ground, and artificial fill. The bedrock units and overlying surficial Quaternary units at RFP are described below

2.2.7 1 Quaternary Deposits

The Quaternary deposits in the RFP area (Figure 2-8) have been categorized into pediment cover and valley fill. The Rocky Flats, Verdos, and Slocum Alluviums represent pediment covers. The valley-fill alluviums include the Louviers and the Broadway Alluviums Additional recent alluvial valley-fill deposits include the Piney Creek and Post Piney Creek Alluviums (EG&G, 1991c)

The Rocky Flats Alluvium is the oldest alluvial deposit in the RFP area and consists of poorly sorted, angular to rounded, coarse gravels, sands, and gravelly clay Caliche amounts vary from trace to abundant (EG&G, 1991c) Dominant lithologies include detritus from Precambrian quartzite, schist, and gneiss Thickness at the type locality immediately south of RFP is 50 feet and ranges from 10 to 90 feet (Machette et al., 1976) The Verdos Alluvium consists of a sandy, cobbly to bouldery gravel deposited by Ralston Creek (Machette et al., 1976). Its thickness ranges from 15 to 35 feet The Slocum Alluvium is composed of well-stratified, clayey, coarse gravel and coarse sand. Its thickness ranges from 10 to 90 feet (EG&G, 1991c)

The Louviers and Broadway Alluviums are composed of coarse sand and cobbly gravel The thickness of these alluviums ranges from 10 to 25 feet. The Louviers Alluvium forms well-developed terraces above modern streams. The Broadway Alluvium occurs in channels cut into the Louviers Alluvium (EG&G, 1991c).



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The Pre-Piney Creek, Piney Creek, and Post-Piney Creek Alluviums are the most recent identified deposits. The Pre-Piney Creek Alluvium consists of silt and sand with pebble lenses, and the Piney Creek Alluvium is composed of clay, silt, and sand with some pebble beds. The Post-Piney Creek Alluvium consists of poorly consolidated, humic, fine-grained to medium-grained sands interbedded with magnetite-rich sands (EG&G, 1991c).

2.2.7.2 Other Surficial Deposits

Other surficial deposits within the Rocky Flats area consist of colluvium, slumps, and valley fill (EG&G, 1991b) Erosion has formed deposits of colluvium on the sides of steep slopes and in the stream valleys. The valley bottoms contain valley-fill deposits deposited by sedimentation from streams. Gentle stream-cut valley walls are often covered in part by shallow slumps. These features are recognized by a curved scarp at the top, a coherent mass of material downslope that may be rotated back toward the slip plane, and hummocky topography at the base. Surficial deposits are generally composed of variable amounts of gravel, sand, silt, and clay. These deposits are derived from Precambrian rocks, younger sedimentary bedrock, and older surficial deposits.

2.2 7.3 Upper Cretaceous Sedimentary Rocks

The Arapahoe Formation is the uppermost bedrock unit underlying RFP and consists primarily of claystones and silty claystones in the RFP area. The Arapahoe Formation is approximately 15 to 20 feet thick in the center of RFP (EG&G, 1992). Arapahoe Formation sandstones are predominantly very fine grained to medium grained, with minor conglomeratic lenses. Weathered sandstones are pale orange, yellowish gray, and dark yellowish orange. Unweathered sandstones are light gray to olive gray. The sandstones typically are interlayered with clay lenses and are lenticular in geometry. The dominant

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claystones and silty claystones are light olive gray to medium olive gray and weather to dark yellowish orange. Iron-oxide staining of Arapahoe Formation sediments is common to depths of 20 feet (EG&G, 1991c)

The Laramie Formation, which is composed of an upper claystone interval and a lower sandstone and coal interval, is approximately 600 to 800 feet thick (EG&G, 1992). The upper Laramie Formation consists of silty claystones and siltstones and fine-grained, lenticular, fluvial sandstones. The silty claystones are light olive gray to olive black, massive, occasionally sandy, and contain carbonaceous material. The siltstones are also carbonaceous, with iron-oxide nodules and slickensides along fractures. The lower Laramie Formation consists of very fine-grained to medium-grained sandstones up to 50 feet thick and coal beds ranging from 2 to 8 feet thick (EG&G, 1991c)

The Fox Hills Formation averages 90 to 140 feet thick and consists of thick-bedded to massive, very-fine-grained to medium-grained feldspathic sandstone that is grayish orange to light gray in color. The sandstones are interlayered with thin beds of siltstone and claystone (EG&G, 1992). The Fox Hills Formation crops out within the RFP buffer zone west of the main plant site.

228 Hydrogeology

Ground water flows in surficial materials and in the Arapahoe and Laramie Formation sandstones and claystones. The uppermost aquifer at RFP consists of surficial materials (Rocky Flats Alluvium, colluvium, valley-fill alluvium, artificial fill, and disturbed ground), weathered bedrock units, and subcropping sandstones of the Arapahoe Formation

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The unconfined ground water flow system in the surficial materials exhibits relatively large potentiometric surface changes in response to precipitation events and stream and ditch flows (Hurr, 1976). There are also seasonal variations in the saturated thickness of the surficial materials. Relative fluctuations in the water-table surface vary approximately 2 to 25 feet at RFP (Hurr, 1976). Recharge is from precipitation, snowmelt, and infiltration from ditches, streams, and ponds. Discharge occurs at minor seeps in colluvial materials that cover the contact between the alluvium and bedrock along the edges of the valleys, by seepage into other geologic formations and streams, and through evapotranspiration. The Arapahoe Formation is recharged by ground water movement from overlying surficial deposits, by infiltration from streams, and by infiltration of precipitation into bedrock that crops out in the western portion of RFP. Recharge is greatest during the spring and early summer, when rainfall and stream flow are at a maximum and water levels in the Rocky Flats Alluvium are high. Recharge conditions in the main plant area may differ from those in undeveloped areas because of the greater amount of paved and covered surfaces.

The potentiometric map in Figure 2-9 indicates that ground water flow in the uppermost aquifer is generally toward the east for areas in OU16. The main plant area is situated on a ground water divide, which lies approximately west-east beneath Central Avenue Generally, ground water flow along the lower contact of the surficial material with the underlying Arapahoe Formation claystones is downgradient

In the western portion of RFP, where the alluvium is thickest, the potentiometric surface is 50 to 70 feet below ground surface. Although the depth to the potentiometric surface in the alluvium is variable, it becomes generally shallower from west to east as the thickness of the alluvium decreases. The direction of unconfined ground water flow is generally to the east along the gently sloping contact between the unconsolidated surficial materials and

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the underlying bedrock Unconfined ground water also exists in subcropping Arapahoe and Laramie Formation sandstones. Regionally, ground water flow in the Arapahoe Formation is toward the South Platte River in the center of the Denver Basin (Robson et al., 1981). Ground water in some Arapahoe Formation sandstones exists under confined conditions

Hydraulic conductivity data specific to the OU16 IHSSs do not exist. However, sitewide data are available. The uppermost aquifer is a heterogeneous deposit that exhibits a significant degree of lateral and vertical lithologic variability. Hydraulic conductivity for the Rocky Flats Alluvium ranges from 1×10^{-2} centimeters per second (cm/s) (Hurr, 1976) to 4×10^{-8} cm/s (U.S. DOE, 1988). The lower Arapahoe Formation sandstones have a hydraulic conductivity of approximately 1×10^{-6} cm/s (EG&G, 1991c). The most recent hydrogeologic investigation indicated that the hydraulic conductivity of the uppermost aquifer is approximately 6×10^{-5} cm/s (EG&G, 1991c)

23 IHSS DESCRIPTIONS AND HISTORIES OF OCCURRENCES/OPERATIONS

The initial step in development of this document was a review of existing information Available historical and background data for each IHSS were collected through a review of the Rocky Flats Environmental Database Systems (RFEDS) and a literature search that included documents at the Rocky Flats Public Reading Room and various RFP libraries. The Historical Release Report (HRR) for the Rocky Flats Plant (U S DOE, 1992) was the primary source of background and environmental sampling information for the OU16 IHSSs. Therefore, the precise locations of OU16 IHSSs in this document may differ from the IAG locations as a result of new information obtained while preparing the HRR. References cited in the HRR relevant to OU16 IHSSs were reviewed and used for characterization of the OU16 IHSSs. The references are included in Appendix A.

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Analytical results for routine environmental monitoring at RFP obtained from RFEDS were used where applicable to evaluate the nature and extent of contamination associated with the OU16 IHSSs. The RFEDS data for ground water and surface water samples for contaminants of interest are presented in Appendices B and C, respectively

2.3.1 IHSS 185, Solvent Spill

Description of Occurrence

On November 10, 1986, at approximately 1 50 PM, a forklift operator was transferring a pallet of 55-gallon drums from a truck to the southeast dock of Building 707. As the operator was lowering the pallet, a fork punctured a 55-gallon drum containing 1,1,1-trichloroethane (TCA), causing approximately 4 gallons of liquid to leak (Rockwell International, 1986e, 1986f, and 1988) onto the southeast dock and adjacent paved areas (US EPA, 1988) The location of IHSS 185 is shown in Figure 2-3.

Response to Operation/Occurrence

The forklift operator immediately notified the shift superintendent, Environmental Science, and the Fire Department of the incident (Rockwell International, 1986e and 1986f). The Fire Department used four bags of Oil Dry, a commercial absorbent, to clean up the spill (Rockwell International, 1988) The absorbent was placed in drums References state conflicting information regarding disposal of the absorbent, which was taken to either Hazardous Storage (Rockwell International, 1986e and 1986f) or an approved offsite facility (Rockwell International, 1988) The punctured drum was sealed, placed in an overpack drum, and sent to the Rocky Flats Hazardous Waste Group for disposal (Rockwell International, 1988)

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2.3.2 IHSS 192, Antifreeze Discharge

Description of Operation/Occurrence

On the morning of December 2, 1980 (Rockwell International, 1980a and 1980b) or December 3, 1980 (Rockwell International, 1980c), RFP Utilities personnel drained approximately 155 gallons of antifreeze solution containing 25 percent ethylene glycol from the evaporator of Brine Chiller CH-1 into a floor drain in Building 708 (Rockwell International, 1980a, 1980b, and 1980c). The antifreeze was drained from the evaporator because it was leaking into the refrigerant portion of the Brine Chiller, which would have caused internal corrosion of the machine

The floor drain discharged into a storm runoff collection system, which consists of a buried metal culvert south of the building. The buried culvert runs eastward from Building 708 under the Building 750 parking lot and terminates at an open metal culvert immediately east of Tenth Street. The storm runoff system discharges from the metal culvert at the east side of what is now the Protected Area (formerly the Perimeter Security Zone) into Walnut Creek (Rockwell International, 1980c)

Rockwell Environmental Analysis personnel observed the release in a ditch immediately east of the Building 750 parking lot at approximately 12:30 P M. on the day of the spill (Rockwell International, 1980a) The location of IHSS 192 is shown in Figure 2-3

Response to Operation/Occurrence

The flow was contained by diverting the stormwater discharge into retention Pond B-1 The Pond B-5 dam was closed, and there was no offsite discharge of the liquid Following the release, 5,000 gallons of water were flushed through the drainage system into Pond B-1 (Rockwell International, 1980a)

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Follow-up samples were collected from several locations between December 2 and December 5, 1980, and were reportedly analyzed (Rockwell International, 1980a); however, information regarding sampling locations, analytical suite, or laboratory results could not be located. Based on visual observations of color and flow direction, it is believed that the spill was contained in Pond B-1 (Rockwell International, 1980a) Pond B-1 (IHSS 142.5) is being investigated as part of OU6 - Walnut Creek

2.3.3 IHSS 193, Steam Condensate Leak - 400 Area

Description of Operation/Occurrence

During the week ending November 30, 1979, an aboveground steam condensate line located between Building 443 and a valve pit north of a gasoline storage tank was found to be leaking (Rockwell International, 1979a). The steam condensate line is situated on a relatively flat part of the plant site (U.S. DOE, 1988), and aerial photographs (U.S. EPA, 1988) indicated that the area between Building 443 and the valve pit was paved at the time of the spill. The location of IHSS 193 is shown in Figure 2-3.

Response to Operation/Occurrence

The line was abandoned in place, and the condensate was rerouted through a different system by November 30, 1979 (Rockwell International, 1979a). Analysis indicated very low concentrations (0 135 ppm, mg/liter) of amines; however, the sampling locations were not identified (Rockwell International, 1979a)

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2.3.4 IHSS 194, Steam Condensate Leak - 700 Area

Description of Operation/Occurrence

On September 26, 1979, an aboveground steam condensate line break occurred in the Building 707 area. Water from the line break flowed into the surface water drainage through Pond B-4 to Walnut Creek. The condensate line contained tritium at an activity of approximately 1,000 pC1/L (Rockwell International, 1979b and 1979c). The volume of condensate that had leaked was not determined, and it is unknown whether this area was paved at the time of the incident. The location of IHSS 194 is shown in Figure 2-3.

Response to Operation/Occurrence

The Rockwell Environmental Analysis group had been informed erroneously that the condensate was going to the sanitary sewer and then to Pond 207-B South On the afternoon of September 27, 1979, diversion of water to Pond B-1 commenced Also at that time, the valve at the new Pond B-5 dam was shut (Rockwell International, 1979b and 1979c).

Samples from Pond B-4 collected between September 26 and September 29, 1979, ranged in tritium activity from less than 524 pCi/L to approximately 926 pCi/L A 24-hour composite sample collected from Walnut Creek at Indiana Street on September 26, 1979, contained 1,163 pCi/L tritium A grab sample collected on September 27, 1979, from the same location contained approximately 700 pCi/L tritium (Rockwell International, 1979b and 1979c)

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2.3.5 IHSS 195, Nickel Carbonyl Disposal

Description of Operation/Occurrence

Approximately 185 pounds of nickel carbonyl [N₁(CO)₄] contained in nine cylinders and one lecture bottle were stored in a toxic gas storage building for several years prior to 1972 (Rockwell International, 1972). From March through August 1972, the nickel carbonyl was disposed in a dry well located in the buffer zone, south of Lindsay Ranch

The location of the well is unclear, as noted by the differing descriptions of the following sources. According to RFP employees involved with the operation, the location of the well was either to the east or west of the road leading north from the landfill. This road is no longer in existence and is not easily identified. The well was reportedly marked with a 6-foot-high fence post, however, the post could not be located during site visits conducted. December 3 and December 9, 1991 (U.S. DOE, 1992). The IHSS 195 location described above differs from the location presented in the IAG, which placed the location along the firebreak road northeast of the intersection of road north of the landfill and the firebreak road. This location was based on a 1989 review of a map and aerial photograph by an employee involved in the operation. This location could not be verified (U.S. DOE, 1992). According to CEARP Phase I Interview Notes (Rea, 1986), the well was located approximately "100 feet before the drop in the first draw approaching the ranch from the south." This location has not been verified.

References state conflicting information as to well dimensions. The dry well was either 3 feet in diameter and 15 feet deep (Rockwell International, 1972), 4 feet in diameter and approximately 20 feet deep (Rea, 1986), or 2 feet in diameter and 15 feet deep (Dow Chemical Company, 1972). The cylinders were suspended in the dry well with ropes after the valves of the cylinders were opened to vent the nickel carbonyl. Further venting was

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accomplished with small arms fire. This method of disposal was selected because nickel carbonyl vapors are denser than air and decompose rapidly upon mixing with the atmosphere. Decomposition was so rapid that spontaneous combustion and/or explosion occurred (Rockwell International, 1972). Combustion products may have collected on the sides and bottom of the well (Dow Chemical Company, 1972). After 24 hours, the empty cylinders were retrieved and buried in the Present Landfill (IHSS 114). Two cylinders became wedged in the hole and were buried in place, presumably empty (Rea, 1986). Individuals were supplied air packs, and a member of the RFP Fire Department supervised the proceedings (Rockwell International, 1972).

Response to Operation/Occurrence

A minimal amount of nickel carbonyl was probably released to the atmosphere during disposal. Samples (presumably of air) at the lip of the well collected after the initial disposal indicated nickel carbonyl concentrations of approximately 10 ppm (Rockwell International, 1972)

2.3 6 IHSS 196, Water Treatment Plant Backwash Pond

Description of Operation/Occurrence

The water treatment plant backwash pond, also known as Pond 6, is abandoned and was located south of the water treatment plant (Building 124) (U S DOE, 1992) A July 1955 aerial photograph shows a pond on the north slope of the Woman Creek drainage, approximately 800 feet south of Building 124 (U S EPA, 1988) The water treatment plant backwash discharge pipeline (U.S. DOE, 1992) is also apparent on this aerial photograph, which suggests that this pond, south of the access road, was the backwash pond for the water treatment plant

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Pond 6 served as a retention pond to allow sampling of water treatment plant backwash water (U.S. DOE, 1992). An indirect reference states that it was used as an "evaporation/settling pond" (Rockwell, 1987). Pond 6 was constructed between January and March 1955 (U.S. DOE, 1992). It is unclear when Pond 6 was abandoned. Aerial photographs suggest that it was no longer active in October 1964 (U.S. EPA, 1988). However, a 1974 reference suggested that Woman Creek continued to receive filter backwash discharges from the water treatment plant (Zillich, 1974).

Documentation that specifically identified Pond 6 as the location of a release was not found. However, Pond 6 was built in the vicinity of the water treatment plant backwash discharge pipeline (U.S. DOE, 1992). An indirect reference states that the pond was used for backflushing sand filters from the "old wastewater treatment plant," which is inferred to be Building 124 (Rockwell, 1987), although it treated raw water and not wastewater. It is therefore possible that Pond 6 received backwash water from the water treatment plant. The backwash water may have contained flocculants (aluminum sulfate or lime), residual chlorine, or suspended solids (U.S. DOE, 1986). An October 1954 reference indicated that discarded backwash water from the water treatment plant flowed through the west side of the "plant burning pit" (IHSS 115) and continued down to Woman Creek (U.S. DOE, 1992). The plant burning pit was used as a dump site for plant incinerator ash, graphite, used caustic drums, and general trash as early as October 1954 (U.S. DOE, 1992). The Pond 6 location may have originally been a natural depression that would have been a logical site for a burning pit and subsequent pond construction.

Effluent from the water treatment plant in 1953 was intermittent and consisted of filter backwash, filter prewash, sludge blowdown, and other wastewater from raw water treatment. This effluent contained silt, mud, and filterable solids removed from raw water. The characteristics of raw water were seasonally variable, therefore, the characteristics of the

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backwash effluent were also variable. Chemical analyses of water samples were performed from November 1952 through June 1953 (Shepherd, 1953)

The CEARP Phase I document describes the water treatment plant backwash pond as an unlined pond on the south side of the water treatment plant building (Building 124). This pond reportedly was used in the early 1970s and was destroyed in the late 1970s when the canal system that reroutes surface water around RFP was constructed (U.S. DOE, 1986). However, aerial photos from 1969, 1971 or 1978 do not indicate the presence of a backwash holding pond on the south side of Building 124 (U.S. EPA, 1978). No other prospective locations for this pond were identified from aerial photographs. It is believed that the CEARP interviewees were referring to Pond 6; however, because of the anonymity of CEARP interviewees, the basis of the CEARP information cannot be verified (U.S. DOE, 1992).

Response to Operation/Occurrence

No remediation of or response to the water treatment plant backwash pond is known to have occurred (U.S DOE, 1992).

2.3.7 IHSS 197, Scrap Metal Sites - 500 Area

Description of Operation/Occurrence

In approximately 1958 or possibly in the early 1960s, scrap metal components, primarily from the original plant construction program, were buried in trenches in the central portion of the plant site, west or southwest of Building 559 (Rockwell International, 1981a) The CEARP Phase I report (U.S. DOE, 1986) indicated that there was a second scrap metal burial site, located west of Building 559 and northwest of the first site, that contained building construction debris from early plant construction, most likely from the Austin

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Company According to CEARP Phase I interview notes (U S DOE, 1986), early records do not document replacement of any transformers at RFP; therefore, there is a slight possibility that transformers containing polychlorinated biphenyls (PCBs) were disposed at the construction debris site. The location of IHSS 197 is shown in Figure 2-3

Response to Operation/Occurrence

During the week ending September 4, 1981 (Rockwell International, 1981a), excavation in what is now the Protected Area (formerly the Perimeter Security Zone) unearthed an old scrap metal burial site immediately west of Building 559 A second scrap metal burial site, located west of Building 559 and northwest of the first site, was also unearthed (U S DOE, On September 9, 1981 (Rockwell International, 1981b), work began to remove buried material from the trenches, and excavation and disposal were completed by October 2, 1981 The material unearthed consisted of moist, but not oily, scrap metal consisting of machine turnings, rings, shapes, overlays, and other metal parts. Although some of the buried material was recovered from process areas and could have been radioactively contaminated, monitoring of the materials using a Field Instrument for Detection of Low-Energy Radiation (FIDLER) indicated no detectable radioactivity. In addition, total longlived alpha concentrations from three portable air samplers at the Building 559 cleanup area showed zero count (Rockwell International, 1981b). Transformers or related material were not present in the material excavated from the scrap metal trenches. According to an internal letter, the material was disposed in the Present Landfill, IHSS 114 (Rockwell International, 1981c)

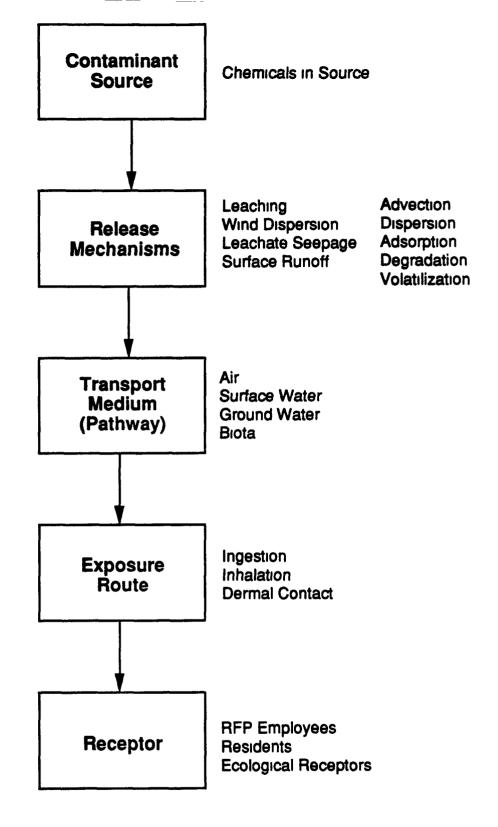
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3.0 PROPOSED ACTIONS AND RATIONALE

31 APPROACH

In accordance with EPA guidance (US EPA, 1989a), a no further action decision is appropriate at sites where a previous removal action or natural environmental processes (e.g., natural attenuation) mitigate risks to human health and the environment. The risks associated with the OU16 IHSSs and the need for further action were assessed using a conceptual model to evaluate the exposure pathways by which humans and biotic receptors may be exposed to contaminants. The conceptual model describes known and suspected sources of contamination, types of contamination, affected media, contaminant migration pathways, and environmental receptors

EPA defines an exposure pathway as "a unique mechanism by which a population may be exposed to chemicals at or originating from the site" (U S EPA, 1989b). As shown in Figure 3-1, an exposure pathway must include a contaminant source, a release mechanism, a transport medium (pathway), an exposure route, and a receptor. An exposure pathway is not complete without each of these five components. If an exposure pathway is not complete, no risk is posed to human health and the environment and no further action is warranted.



Generic Site Conceptual Model

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The individual components of an exposure pathway are defined as follows.

- <u>Contaminant Source</u> Includes contaminants and/or contaminated environmental media associated with historical operations/occurrences at each OU16 IHSS
- Release Mechanisms: Physical and chemical processes by which contaminants are released from the source. The conceptual model identifies primary release mechanisms, which release contaminants directly from the IHSSs, and secondary release mechanisms, which release contaminants from environmental media.
- Transport Medium (Pathway) A medium into which contaminants are released from the source and from which contaminants are in turn released to a receptor (or to another transport medium by a secondary release mechanism) Primary transport media include air, surface water, ground water, and biota
- Exposure Route: An avenue through which contaminants are physiologically incorporated by a receptor Exposure routes for receptors at OU16 are inhalation, ingestion, and dermal contact
- Receptor A population affected by contamination released from a site Human receptors for OU16 primarily include RFP workers and visitors Environmental receptors include biota (both flora and fauna) indigenous to the OU16 environs

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The conceptual model for the OU16 is based on the physical setting, descriptions and histories of occurrences/operations, and nature of contamination at the IHSSs discussed in Section 2.3. The conceptual model provides an overview of all potential exposure pathways that may result from releases from and into each transport medium. Some of these pathways have a higher potential for occurrence than others, based on an evaluation of the source characterization information, including consideration of the remedial response actions and an evaluation of the fate and mobility of the contaminant in each potential source and transport medium

3.2 IHSS-SPECIFIC RATIONALE

The evaluation of the exposure pathway specific to each IHSS in OU16 is presented below Based on this evaluation, recommendations for further action are proposed

3.2 1 IHSS 185, Solvent Spill

On November 10, 1986, approximately 4 gallons of TCA leaked from a 55-gallon drum onto the southeast loading dock of Building 707 and a paved area adjacent to the loading dock (Section 2.3 1) Documentation indicates that a commercial absorbent was used to clean up the spill (Rockwell International, 1986e and 1986f) This response action minimized or potentially eliminated the source of TCA contamination. Because the spill occurred on a paved area, the wind dispersion transport pathway is not applicable and the infiltration/leaching transport pathway was minimized or eliminated, depending on the condition of the pavement. Ground water quality data from monitoring well P218089, located approximately 50 feet from IHSS 185 (Figure 2-9) and screened in the upper hydrostratigraphic unit, indicated that TCA contamination of ground water has not occurred in the upper hydrostratigraphic unit at this location. TCA was not detected in any of the

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eight samples collected between November 1989 (the date of installation) and April 1992 (Appendix B). Because of the high vapor pressure of TCA, volatilization would be rapid (U.S. EPA, 1979) This represents the primary transport pathway for TCA at IHSS 185 Because the cleanup response action was immediate, the negligible infiltration due to paving and the high volatility of TCA, coupled with probable subsequent volatilization/loss since the spill occurred, it is unlikely that any residual TCA related to the release is present Because it is also unlikely that a contaminant source currently exists, the exposure pathway for IHSS 185 is not complete, thus eliminating risk to human health and the environment Therefore, no further action is warranted for IHSS 185

3.2.2 IHSS 192, Antifreeze Discharge

As described in Section 2 3.2, a release of 155 gallons of antifreeze containing 25 percent ethylene glycol was diverted into Pond B-1 The drainage system was subsequently flushed with 5,000 gallons of water (Rockwell International, 1980a)

Infiltration of ethylene glycol into the surficial materials likely occurred at the time of the release. However, infiltration of water (5,000 gallons) flushed through the system immediately after the release and infiltration of surface runoff and rainwater during the 12 years since the release occurred have very likely diluted the ethylene glycol to concentrations below the detection limit. In addition, data indicated that ethylene glycol undergoes degradation fairly readily. Laboratory tests with river water indicate complete degradation in a few days at 20°C; at 8°C, 14 days were required (Sax, 1986). Because it is unlikely that residual ethylene glycol could be detected at this time as a result of dilution and degradation (i.e., there should be no source), the exposure pathway is not complete and there is no risk to human health and the environment. Therefore, no further action is necessary for IHSS 192.

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3.2.3 IHSS 193, Steam Condensate Leak - 400 Area

During the week ending November 30, 1979, a steam condensate line containing water (condensate) with 0 135 mg/L amines was found to be leaking (Section 2 3 3). Aerial photographs (U.S EPA, 1988) indicated that the area where the leak occurred was paved The paved surface minimized or eliminated the infiltration pathway, depending on the condition of the pavement. The wind dispersion pathway was also eliminated because of the paved surface. In addition, it is very unlikely that amines related to this IHSS would be detected in surface water environmental samples at this time, given the initially low concentration of amines and subsequent volatilization, degradation, and dilution of the condensate by rainfall/runoff during the 12 years since the release occurred. It is unlikely that a contaminant source currently exists, as the exposure pathway for IHSS 193 is not complete, and there is no risk to human health or the environment. Therefore, no further action is warranted for IHSS 193

324 IHSS 194, Steam Condensate Leak - 700 Area

On September 26, 1979, a steam condensate line break containing low levels of tritium occurred inside what is now the Protected Area (formerly the Perimeter Security Zone) in the Building 707 area (Section 2 3 4) The condensate had an approximate tritium activity of 1,000 pCi/L (Rockwell International, 1979b and 1979c) The maximum background activity for tritium in surface water at RFP was determined in the Background Geochemical Characterization Report (EG&G, 1990) to be 980 pCi/L Therefore, the concentration of tritium released in the condensate leak does not differ statistically from the reported maximum background activity

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As discussed in Section 2.3 4, condensate flowed through Pond B-4 to Walnut Creek until the afternoon of September 27, 1979, when flow was diverted into retention Pond B-1 Tritium activity in water samples collected from Pond B-4 between September 26 and September 29, 1979, ranged from 524 pCi/L to 926 pCi/L (Rockwell International, 1979b and 1979c). These results are below the 980 pCi/L maximum background activity for surface water presented in the Background Geochemical Characterization Report (EG&G, 1990) Samples collected from Walnut Creek at Indiana Street on September 26, 1979, contained slightly elevated tritium activity (1,163 pCi/L) for a 24-hour composite versus the maximum background value (Rockwell International, 1979b and 1979c) By the time the water was diverted to Pond B-1 on September 27, 1979, a grab sample collected at the same spot on Walnut Creek contained tritium activity (700 pCi/L) below the maximum background activity In addition, tritium activity in samples collected from Pond B-4 during May through September 1991 were below maximum background (Appendix C). In 1989, samples from Pond B-1 were analyzed for tritium (EG&G, 1991d); analytical results indicated activity (360 pCi/L + 220 pCi/L) below maximum background activity

RFP alluvial monitoring well P218089 is located within 50 feet of the IHSS (Figure 2-9) Ground water samples collected in May 1990, June 1991, and August 1991 were analyzed for tritium (Appendix B). Tritium activity ranged from 110 to 383 pCi/L, which is below the 390 pCi/L maximum background activity reported for RFP alluvial ground water at RFP (EG&G, 1990)

Because the released tritium has undergone one half-life decay during the 12 years since the release occurred, the present-day maximum tritium activity associated with this IHSS would be less than approximately 500 pCi/L. This value is less than the maximum background activity of 980 pCi/L reported in surface waters at RFP (EG&G, 1990). In addition, dispersion/dilution would also reduce concentrations of tritium related to this release

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At present, it is unlikely that tritium activity associated with the steam condensate leak exceeds background values because (1) tritium concentrations in the initial release were very near maximum background levels, (2) a portion of the release was contained in Pond B-1, (3) current analyses of Pond B-1 water have indicated tritium activity well below maximum background, (4) the half-life decay of tritium has reduced activity by half, and (5) dilution has further reduced tritium activity. Therefore, tritium associated with this IHSS does not represent a source of contamination—IHSS 194 does not pose a risk to human health and the environment, and no further action is warranted

3.2.5 IHSS 195, Nickel Carbonyl Disposal

From March through August 1972, cylinders of nickel carbonyl were opened, lowered into a dry well located in the buffer zone, and vented with small arms fire to allow decomposition in air. Two of the cylinders became wedged and were buried in place (Section 2.35)

Samples, probably of air, from the lip of the well indicated nickel carbonyl concentrations of approximately 10 ppm being released during the disposal. These samples, collected and analyzed 20 years ago at the time of disposal, would not represent modern-day conditions because of the fate and transport characteristics of nickel carbonyl. Nickel carbonyl is highly volatile (oxidation is so rapid that combustion and/or explosion occur in air) and readily decomposes in the presence of oxygen. Immediately upon decomposition of nickel carbonyl, residual nickel would combine with oxygen in the atmosphere to form very fine-grained nickel oxide (Brady and Humiston, 1982), which would be driven from the dry well by air currents resulting from explosion and the heat of combustion. Wind dispersion probably caused widespread dissemination of nickel oxides, which would probably not be detected at concentrations exceeding background. Therefore, residual nickel associated with IHSS 195.

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does not represent a source of contamination. IHSS 195 does not pose a risk to human health and the environment, and no further action is warranted

3.2 6 IHSS 196, Water Treatment Plant Backwash Pond

The CEARP Phase I document suggested that IHSS 196 was excavated in the 1970s when the RFP surface water diversion system was constructed. However, this information cannot be verified because of the anonymity of the interviewees

New information presented in the HRR (U.S DOE, 1992) indicated that the correct location of IHSS 196 is approximately 800 feet south of Building 124 on the north slope of the Woman Creek drainage. This location is approximately 100 feet hydraulically downgradient of IHSS 115, the Original Landfill

Because a previous removal action has not eliminated the source, and natural environmental processes have not prevented release and migration of contaminants, the exposure pathway for IHSS 196 is complete. Therefore, there is potential risk to human health and the environment, and further action is warranted. However, investigative action proposed for IHSS 115 in Table 5 of the IAG (U S DOE, 1991a) represents appropriate further action for IHSS 196 because (1) the area of investigation for IHSS 115 includes IHSS 196, (2) the target analytes for the IHSS 115 investigation include contaminants associated with IHSS 196, and (3) contaminant concentrations associated with IHSS 115 are likely to be significantly greater than concentrations associated with IHSS 196. Thus, additional action specific to IHSS 196 is not warranted

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3.2.7 IHSS 197, Scrap Metal Sites - 500 Area

As discussed in Section 2.27, scrap metal components from the original plant construction program were buried in trenches in the central portion of the plant site in the vicinity of Building 559 during the late 1950s to early 1960s. In 1981, the buried material was excavated for construction of what is now the Protected Area (formerly the Perimeter Security Zone). Documentation of the excavation activities indicated that the material unearthed was not oily and did not contain electrical transformers and/or related material (Rea, 1986). Health and safety monitoring performed during removal activities did not detect any radioactive contamination. Therefore, there is no apparent source of contamination, and the exposure pathway is not complete. Risk to human health or the environment does not exist, and further action is not warranted.

3.3 SUMMARY

Sources and potential migration pathways for each IHSS in OU16 are summarized in Table 3-1 Potential risks to human health and the environment associated with historical releases and spills at IHSSs 185, 192, 193, 194, 195, and 197 have been mitigated by past response actions and/or natural attenuation processes that eliminate the source or exposure pathways Therefore, further action is not justified for these six IHSSs

Because a previous removal action has not eliminated the source, and natural environmental processes have not prevented release and migration of contaminants, the exposure pathways for IHSS 196 are complete. Therefore, there is potential risk to human health and the environment, and further action is warranted for this IHSS.

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Because investigative action proposed for IHSS 115 in Attachment 2, Table 5, of the IAG (U.S. DOE, 1991a) represents appropriate further action for IHSS 196, separate action specific to IHSS 196 is not warranted

Table 3-1 OU16 Low-Priority Sites Sources and Pathways

	Source	Air Pathway	Surface Water Pathway	Ground Water Pathway	Analytical Results
IHSS 185					
Solvent Spill	Eliminated by response action	Eliminated by wind dispersion, paved surface	Eliminated by volatilization and dilution	Eliminated by paved surface	Below detection limits
1HSS 192					
Antifreeze Discharge	Contained by diversion	Not applicable	Contained by diversion	Eliminated by diversion	N/A°
IHSS 193					
Steam Condensate Leak - 400 Area	Eliminated by volatilization, degradation, dilution	Eliminated by wind dispersion, paved surface	Eliminated by volatilization, degradation, dilution	Eliminated by paved surface	N/A°
IHSS 194					
Steam Condensate Leak - 700 Area	Eliminated by half-life decay, dilution, diversion	Not applicable	Eliminated by half-life decay, dilution, diversion	Eliminated by half-life decay, dilution, diversion	Below background values
1HSS 195					
Nickel Carbonyl Disposal	Eliminated by degradation, eliminated by wind dispersion	Eliminated by wind dispersion and subsurface disposal	Eliminated by degradation and subsurface burial	Mobilization of residual nickel possible	N/A°
1HSS 196					
Water Treatment Plant Backwash Pond	Source present	Air pathway exists	Surface water pathway exists	Ground water pathway exists	N/A
1HSS 197					
Scrap Metal Sites - 500 Area	Eliminated by excavation	Not applicable	Not applicable	Eliminated by excavation	Below detection Itmits

 $[\]bullet$ N/A = analytical results not available

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Approved by:		
Manager, Remediation Programs	RFI Project Manager	

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APPENDIX A OU 16 REFERENCES FROM THE HISTORICAL RELEASE REPORT

APPENDIX A

IHSS 185, Solvent Spill	Tab A
IHSS 192, Antifreeze Discharge	Tab B
IHSS 193, Steam Condensate Leak - 400 Area	Tab C
IHSS 194, Steam Condensate Leak - 700 Area	Tab D
IHSS 195, Nickel Carbonyl Disposal	Tab E
IHSS 196, Waste Treatment Plant Backwash Pond	Tab F
IHSS 197 Scrap Metal Sites - 500 Area	Tab G

IHSS # 185 Internal Letter

TO



Rockwell International

gran grant

December 15, 1986

Those Listed

No

PROM (Norte, Organization, Internal Address, Priori

D. O. Kissel

. I & S S E

Building T452C

. 2991

SUBJECT: FINAL SIR #86-11-707.1 - TRICHLOROETHANE INCIDENT

Per HSE 3.01, "Notification, Investigation, and Reporting of Occurrences," a copy of the SIR investigation is forwarded to you.

A master copy will be retained in the Industrial & Systems Safety Engineering office.

Ciasis.

D. O. Kissel
Industrial Safety Coordinator
Industrial & Systems
Safety Engineering

Enc.

7:

Distribution	Directors	HS&E Area Reps.	Bldg. Supers.
F. T. Antonich C. P. Bader C. W. Ellis M. F. Hickey C. T. Illsley G. J. Steppen	G. W. Campbell J. E. Kinzer W. A. Kirby G. R. Langheim D. J. Sanchini W. M. Shannon C. W. Weidner W. F. Weston G. L. Wilson B. D. Wozniak E. R. Young	S. A. Buckie E. A. DiCarlo C. R. Lagerquist J. M. Ortiz J. A. Ray D. R. Sweet	R. J. Nau J. H. Quella D. E. Sturgeon

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3. <u>Division or Project</u> Rockwell International At Jayon .

- 4. Facility, System or Equipment
 Rocky Flats Plant, Building 707 Dock Southeast.
- 5. Date of Occurrence
 November 10, 1986
- 6. Time of Occurrence 1:50 P.M.
- 7. Subject of Occurrence
 55 gallon drum of 1,1.1-Trichloroethane
- 8. Apparent Cause

Design Material Personnel X Procedure Other

- 9. Description of Occurrence
 The fork lift operator was lifting a pallet of drums from a truck to the southeast dock of Bldg. 707. As he was lowering the pallet of drums to the dock, he was in close proximity to drums already stationed on the dock. A fork punctured one of the drums containing trichloroethane, causing approximately 4 gallons of material to leak to the ground. Four bags of absorbent was used to clean up the spill.
- 10. Operating Certification of Facility at Time of Occurrence:
 Does not apply
- II. Immediate Evaluation:
 The cause of the occurrence was the fork lift operator could not judge the distance between the drum on the dock, and the drums that he was setting on the dock.
- 12. Immediate Action Taken and Results:
 The fork lift operator notified the Shift Superintendent,
 Environmental Science and the Fire Department by Emergency phone
 (2911) of the incident. The material was cleaned up by the Fire
 Department and placed into a drum. The drum was removed from the
 area and taken to Hazardous Storage.

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- 13. Is Further Evaluation Required? Yes No X
- 14. Final Evaluation and Lesson Learned:
 Fork lift operators have been informed when unloading drums, to be certain of the distance they have to work with when setting them on the docks.
- 15. Corrective Action:
 The fork lift operators have been instructed when unloading drums or pallets to the dock area, to be sure that they are totally aware of their surroundings and the distances involved. In the future spotters will be used in areas of restricted vision.
- 16. Programmatic Impact:
- 17. Impact Upon Codes and Standards:
 None
- 18. Similar Unusual Occurrence Report Numbers.
- 19. Signatures:

C. W. Ellis, Plant Services

F. T. Antonich, Industrial Safety Representative

G. J. Steppens, HS&E Area Representative

C.J. Tisley,/Environmental Specialist

Page 1 of 2 Pages 1. S. I. R. 86-11-707.1 2. Status Initial And Interim Final. November 19, 1986

- 3. Division or Project Rockwell international
- 4. Facility, System or Equipment Rocky Flats Plant, Building 707 Dock Southeast.
- 5. Date of Occurrence November 10, 1986
- 6. Time of Occurrence 1.50 P.M.
- Subject of Occurrence
 55 gallon drum of 1,1,1-Trichloroethane 7.
- 8. Apparent Cause

Design Material Personnel X Procedure Other____

- 9. Description of Occurrence The fork lift operator was lifting a pallet of drums from a truck to the southeast dock of Bldg. 707. As he was lowering the pallet of drums to the dock, he was in close proximity to drums stationed on the dock. A fork punctured one of the drums containing trichloroethane, causing approximately 4 gallons of material to leak to the ground. Four bags of absorbent was used to clean up the spill.
- 10. Operating Certification of Facility at Time of Occurrence. Does not apply
- Immediate Evaluation: The cause of the occurrence was the fork lift operator could not judge the distance between the drum on the dock, and the drums that he was setting on the dock.
- 12. Immediate Action Taken and Results The fork lift operator notified the Shift Superintendent, Environmental Science and the Fire Department by Emergency phone (2911) of the incident. The material was cleaned up by the Fire Department and placed into a drum. The drum was removed from the area and taken to Hazardous Storage.

- 13. <u>Is Further Evaluation Required?</u>
 Yes No X
- Final Evaluation and Lesson Learned
 Fork lift operators have been informed when unloading drums, to be certain of the distance they have to work with when setting them on the docks.
- The fork lift operators have been instructed when unloading drums or pallets to the dock area, to be sure that they are totally aware of their surroundings and the distances involved. In the future spotters will be used in areas of restricted vision.
- 16. <u>Programmatic Impact</u>. None

17. Impact Upon Codes and Standards

- 18. Similar Unusual Occurrence Report Numbers
 None
- 19. Signatures:

None

C. W. Ellis, Plant Services

F. T. Antonich, Industrial Safety Representative

G. J. Steppens, HS&E Area Representative

sley,/Environmental Specialist

7

IHSS# 192 Internal Letter



December 5, 1980

D D Hornbacher Building 123

Rogers. Bldg. 707 Utilities

2363

RELEASE OF ANTIFREEZE SOLUTION INTO STORM DRAIN - BUILDING 708

During the morning of Wednesday, December 3, 1980, two Utilities operators and a Maintenance pipefitter drained about 150 gallons of antifreeze solution from the evaporator of Brine Chiller CH-1 into the floor drains near the chiller The antifreeze solution contained 25% ethylene glycol in water. The floor drains in the building discharge into a buried culvert south of the building. The culvert runs eastward from Building 708 under the Building 750 parking lot and terminates just east of Tenth Street. The appearance of the antifreeze was noted in the ditch by Environmental personnel

The antifreeze had to be removed from the chiller without undue delay since it was discovered it was leaking into the refrigerant portion of the equipment. A freon-water mixture can corrode the machine internally if not removed promptly. The Environmental group was not advised of the evaporator draining operation

After draining the evaporator it was decided by Utilities to remove the antifreeze contaminated refrigerant from the chiller. The Environmental group was notified of this phase of the operation in advance of pumping out the freon into drums. Waste Processing personnel were also contacted to determine proper disposal procedures for the freon

Obviously the Environmental group should have been contacted during the initial phase of the operation. To ensure that everyone in the Building 707 Utilities group is made aware of the importance of environmental concerns, this subject will be the main topic of the December safety meetings addition, arrangements will be made with Environmental personnel to conduct a tour for all operators to show how the water courses and holding ponds downstream from the plant are used to control effluent from the plant

RI Kogers F. Rogers 707 Utilities

R. W. Woodard

Rockwell, 1980a

TO SEE A CONSTRUCTION AND STORES TO THE PARK ASSESSMENT OF A RECEIPMENT OF THE SECOND STORES OF THE SECOND STORES

Internal Letter IHSS# 192



Date

December 5, 1980

TO Address

T. R. Crites

No

FROM D. D. Hornbacher

Address

Phone

Subject

ENVIRONMENTAL ANALYSIS WEEKLY HIGHLIGHTS WEEK ENDING DECEMBER 5, 1980

PROBLEMS

Anti-Freeze Discharge Into Walnut Creek-RLH, RWH On December 2, 1980 approximately 155 gallons of 25 percent ethelyene glycol (anti-freeze) solution was discharged into North Walnut Creek. The anti-freeze was released from a chiller unit into a floor drain in the Utilities Bldg. 708 This drain discharges into a storm runoff collection system in the Bldg. 700 complex. At about 12:30 p m., it was initially observed by Environmental Analysis personnel at a point just east of the Bldg. 750 parking lot. The flow was contained by diversion into Pond B-1. Follow-up samples were collected from several locations and are being analyzed Based on visual observations of color and flow, it is believed that all of the spill was contained in Pond B-1. The Pond B-5 dam was closed and there was no offsite discharge of the liquid.

Follow-up activities include: (1) flushing 5000 gallons of water through the system into Pond B-1, (2) Utilities will prepare a report of the incident that includes corrective actions.

Ambient Air Sampler Down Time-RWH Due to a transformer failure, ambient air sampler No. S-36 was out of service for about one week. Repairs have been ordered to correct the problem.

Buffer Zone Access -CTI Unauthorized personnel have been gaining access to the buffer zone by merely signing the log book. Plant Protection has been reminded that approval for access must come from the Environmental Analysis Land Use Coordinator.

Hydrologic Test Hole Laboratory Support-NDK Four hydrologic test hole samples are split with the Colorado Department of Health. The alpha and beta concentrations for four samples collected in September were reported by CDH at the November exchange meeting. The Rocky Flats samples have not been analyzed by the Bldg. 881 Laboratory. Faster turn around time is needed on any sample that is split with an outside agency. The Laboratory has been contacted concerning this problem.

ACCOMPLISHMENTS

Computer Support-JLZ
The first portion of a computer program designed to keep track of the HS&E budget and manpower allocation has been completed. The program has been demonstrated to R. E. Yoder and W. L. Jacobs. Overall, the program was found to be satisfactory and some additions were suggested. Graphics will be added after our plotting software package arrives.

Annual Report-CJB, IMM

A "mock-up" of a new version for annual report formatting was prepared and distributed for review. A meeting will be held in January to firm up format changes before drafting of the 1980 report begins.

Plant Clean Plan-RWH
Milestone No. 1 of a long-range HS&E goal to conduct cleanup
activities was completed on schedule This milestone was to
prioritize all future cleanup activities. The priority list
is for the period 1981 through 1995.

INFORMATION

PARK. -1 SE

Reviews-CJB, RWH, IMM, RLH
A total of five Federal Registers and four Engineering Authorizations were reviewed. One of the authorizations is for modifications to the Bldg. 995 Sanitary Treatment Plant.

Wind Energy Sewage Treatment Facility-RWH
The proposed septic tank/leach field system for the new Wind
Energy Building has been disapproved by Jefferson County.

Lawsuit Support-CTI
The 16 air filters originally sent to EML for analysis have been forwarded to LASL and that laboratory is in the process of analyzing the samples. This work is in support of the lawsuit.

Geologic/Seismologic Project-CTI
The final trenches near Golden have been excavated and geologic examination will be complete this weekend. A final discussion of data and conclusions will be held with the U.S. Geological Survey and the Colorado Geological Survey on December 10. Project completion is projected at this time for January 30, 1981.

NPDES Permit Presentation-NDK, RLH Information Services is preparing slides for the December 10, 1980 NPDES Permit Public Hearing. Also, backup data on the hydrologic test holes is being prepared for use if needed. A final review of the presentation will be held on Monday, December 8, at 1.30 p m. in the Bldg. 111 Conference Room A.

D. D. Hornbacher

IHSS# 192

Internal Letter

December 8, 1980

CHIPANY

F. G Owen

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R. E. Yoder

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Date

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Rockwell International

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HEALTH, SAFETY AND ENVIRONMENT HIGHLIGHTS

PROBLEMS

On December 2, 1980 approximately 155 gallons of 25 percent ethelyene glycol (anti-freeze) solution was discharged into North Walnut Creek The anti-freeze was released from a chiller unit into a floor drain in the Utilities Building 708. This drain discharges into a storm runoff collection system in the Building 700 complex. At about 12 30 p.m., it was initially observed by Environmental Analysis personnel at a point just east of the Building 750 parking lot. The flow was contained by diversion. into Pond B-1 Follow-up samples were collected from several locations and are being analyzed. Based on visual observations of color and flow, it is believed that all of the spill was contained in Pond B-1. The Pond B-5 dam was closed and there was no offsite discharge of the liquid. Follow-up activities include (1) flushing 5000 gallons of water through the system into Pond B-1, (2) Utilities will prepare a report of the incident that includes corrective actions.

Four hydrologic test hole samples are split with the Colorado Department of Health - The alpha and beta concentrations for four samples collected in September were reported by CDH at the November exchange meeting - The Rocky Flats samples have not been analyzed by the Building 881 Laboratory - Faster turn around time is needed on any sample that is split with an outside agency - The Laboratory has been contacted concerning this problem.

Problems have caused our backlog of samples to be alpha counted to increase to 230. Removing this backlog prior to the holiday break may require some weekend sample changing, particularly if there is much more of a delay in getting the 32 detectors back on line

ACCOMPLISHMENTS

A paper titled "Dose Limitation Practices in Recovery Operations involving Prior Environmental Releases of Plutonium" by D. D. Hornbacher, C. J. Barker, and T. R. Crites has been approved by DOE for submittal to the IAEA symposium on "The Application of the Dose Limitation System in Radiation Practices" to be held in Madrid, Spain, October 1981.

DOES NOT CONTAIN OFFICIAL USE ONLY INFORMATION

36 WIPANY CONFIDENTIAL

Name/Org: FMCBC (Vassen Date/O-28-08

Rockwell, 1980c

COMPANY CONFIDENTIAL

F. G. Owen
Page 2
December 8, 1980

Dr Bistline called on several hospitals in the Denver area to discuss obtaining the records of our former employees who died of brain tumors in their hospitals. The hospitals said they must have current and acceptable authorizations—St. Anthony's Central said this must be dated within 90 days of the request and Beth Israel said within 30 days. St. Anthony's said they will consider releasing the records for this special project, but only three out of the 22 cases of interest would be involved. They will be contacting us on this. The other hospitals were very emphatic about their requirements.

Ten nuclear materials safety limits were written, four Engineering, OSA and Work Order reviews were completed, twelve nuclear safety audits were performed; and two criticality indoctrinations were given

Three self-testing neutron criticality detectors (which constantly compare the count rate of the internal detector, having an alpha source near its active surface, to the output of a local oscillator have been installed in Building 707 criticality alarm system since December 1

Total laboratory analyses for the week - 7,480

INFORMATION

There were four OSAs acted upon during the past week.

At 1 56 pm on December 3, a fire sprinkler head was opened in Room 32 of Building 447 by radiant heat from the "chip roaster" located in that area. The roaster is located in the southwest portion of the room and extends into Room 502 above and on previous occasions has opened sprinklers in this manner at both levels. Approval to remove and plug one head at each floor level where this problem occurs, was obtained from Bob Morris which should eliminate further occurrences.

Michelle Reyes of the LASL Epidemiology Group is coming to Rocky Flats December 10 and 11 to work with us on the brain tumor cases and controls.

Oak Ridge has expressed interest in having an experiment performed at the RFP Critical Mass Laboratory. From brief discussions, the experiment would involve uranyl nitrate, and anticipated funds to RFP would be ~\$15,000



F. G Owen
Page 3
December 8, 1980

A meeting was held at DOE/ALO on December 1, 1980 to discuss SAR requirements for the Small Wind Energy Conversion Systems (SWECS) program—It was decided that W. Sayer, ALO/OSD, would write a letter to DOE Headquarters requesting that the OSAs, RF Test Program Data, and Environmental Assessments suffice for fulfilling the intent of the SARs—No further action is required of RFP at this time.

Troublesome alarming of large numbers of Selective Alpha Air Monitors throughout Building 771 continues to occur. Previous efforts to confirm and correct ground and neutral input voltage paths seems to be only a partial answer. Multiple alarming, occurring over the Thanksgiving weekend—at times during the day shift when no welding or building electrical modifications are occurring, is complicating the troubleshooting approach. Different experiments on power line isolation are being conducted but with no definite conclusion.

We are still finding high bacteria counts in bottled water. Various alternatives are being considered. Finding another vendor (there are indications the water is coming in this way), using tap water in the bottles, or stopping the use of bottled water altogether (our preferred way).

We have no official word from DOE on DOP usage. George Carroll of ALO reports by phone they are working on it and we should probably continue as we are (using DOP for filter and respirator checks, and proceed with efforts to use corn oil for quantitative fitting) until DOE can investigate all alternatives

Robert E Yoder, Director

Health, Safety and Environment

CC

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D H Dunbar

R O Williams, Jr

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IHSS #193

Internal Letter



Rockwell International

November 30,1979 Dute

TO T. R. Crites

Address

FROM

No

Address

D D. Hornbacher

Phone

ENVIRONMENTAL ANALYSIS WEEKLY HIGHLIGHTS WEEK ENDING NOVEMBER 30, 1979

PROBLEMS

Radiometric Survey-RWH

Due to snow and cold weather, no work was conducted on the radiometric survey.

Plant Security Zone-RWH, DFH

A meeting was held with Rockwell Engineering and the consulting engineers for the new plant security zone Problems were identified concerning footing drains at Buildings, 371, 374, 771 and 991 which will have to be modified.

Steam Condensate Line Leakage-DFH

A steam condensate line located between Bldg. 443 and a valve pit north of a gasoline storage tank was found to be leaking. Water analysis indicated very low concentration (0.135 ppm) of amines. The line has been abandoned and the condensate rerouted.

Buffer Zone Control-CTI

On November 19, Gate P21 in the buffer zone was found to be partially rewired. An unknown person entered Sector X and drove to Pond D-1 This incident was reported to the Security Department.

Stack Effluent Data-RMN

Plutonium, uranium and beryllium stack data were not available in time for the monthly exchange meeting. Also, the uranium data for Bldg 881 are higher than normal and require followup actions to determine if the data are valid and if valid, the cause for increases

Soil Sampling Program-CTI

Due to multiple snow falls, the new soil sampling program to study vertical and horizontal migration of radionuclides in soils in the east sector of the buffer zone has been delayed. Unless we have some nice weather, there may not be any soil data for the annual environmental monitoring report for CY 79.

ACCOMPLISHMENTS

Information Exchange Meeting-CJB

The monthly information exchange meeting for October data was held on November 28. Rocky Flats did not have stack emission data. All other data reported by Rocky Flats and The colorado Department of Health were normal.

Rockwell, 1979c

T. R Crites Page 2 November 30, 1979

EPA Discharge Permit Application-RLH
The permit application forms for Dams A-4, B-5 and C-2 have been completed and are ready for transmittal to RFAO

INFORMATION

Talks-DDH
One new employee indoctrination on environmental monitoring was given this week.

Reviews-CJB, RWH
A total of six Federal Registers, five EJO's, and two OSA's were reviewed for environmental concerns.

FIS Activities-CTI
Preparation of Appendix J for the Final Impact Statement has been initiated. This appendix will list the names and qualifications of major contributors to Volume I has been initiated and is to be completed by December 14.

Draft Soil Sampling Reports-CTI
Two draft reports that evaluate some past soil data have been prepared, reviewed and are ready for final typing and distribution.

Travel-RLH
R. L. Henry traveled to San Francisco to participate in a training course on Water Quality Engineering for Industry. The course was offered by the American Society for Chemical Engineers.

D. D. Hornbacher

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Fockwell rise annial

September 28, 1979

R. E. Yoder

T. R. Crites

ENVIRONMENTAL SCIENCES WEEKLY HIGHLIGHTS WEEK ENDING SEPTEMBER 28. 1979

PROBLEMS

A steam condensate line break in the Bldg. 707 area occurred on September 26. Environmental Analysis was informed by Utilities that the water was going to the sanitary system and then to Pond 207-B-South. This was not the case, the water was actually going into surface water drainage through Pond B-4 to Walnut Creek. On the afternoon of September 27, we began diverting water to Pond B-1 and also shut the valve at the new B-5 dam. Fortunately, the condensate contained tritium at only about 1000 pCi/l. Samples from Pond B-4 ranged from ≤ 524 to approximately 926 pCi/l. Samples from Walnut Creek at Indiana showed 1163 pCi/l for a 24 hour composite covering 9-26-79 and about 700 pCi/l in a grap sample for 9-27-79. We are meeting with Utilities to discuss the problem of misinformation and the potential consequences of offsite release of steam condensate.

On Friday, September 21, the contractor for the Surface Water Control Project was found scraping top soil in an area that had not been scarified near the C-2 dam. The operation was stopped immediately. Air sampler results did not show any airborne TLLa activity. On Monday, the area was covered with new top soil.

We have experienced difficulty with Site Survey monitors meeting their support requirements. Special and routine air sampler filter pickup schedules were missed several times this week.

The flux tower anemometer is still awaiting calibration in the University of Colorado wind tunnel as the Wind Test Site has not paid their bill from previous work there.

ACCOMPLISHMENTS

The information exchange meeting to exchange August data with the Colorado Department of Health was held on September 25. All data reported by Rockwell and CDH were within normal ranges. There were no violations of the NPDES permit. Personnel from the USEPA presented a program on the proposed standard for uranium in drinking water. The Safe Drinking Water Act of 1974 was discussed at length.

A total of 30,000 square feet was radiometrically surveyed this week. No hot spots were found.

DOES NOT CONTAIN OFFICIAL USE ONLY INFORMATION Name/Org/FMCBC Wassin Date/U-28-08

Rockwell, 1979a



R. E. Yoder Page 2 September 28, 1979

The tandem filter project on an ambient air sampler, installed near sampler S-7, is underway. A location for the stack sampler phase of the project, in the 771 main stack, has been selected and the samplers are being installed. Three samplers will be run in parallel.

Litter samples (15) from the southeast and northeast terrestrial study plots were collected this week for transuranic analysis.

INFORMATION

The posting to replace S. M. Elgawhary has been made.

Track analysis has been completed on the S-7 vicinity impactor sampler data (obtained in July prior to application of coherex on the interior security fence road). This implies a specific activity of the fines of about ten times that as on the course cyclone material.

A total of seven Federal Registers and five construction projects were reviewed this week for environmental concerns.

A paper by Tom Crites, "The Effect of Plowing on 241 Am Contamination in Sandy Soil," has been accepted for publication in Health Physics.

Jon City

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T. R. Crites, Manager Environmental Sciences

Internal Letter

IHSS #194

Date September 28, 1979

TO T R. Crites

No

FROM D. D. Hornbacher

Rockwell International

Address

Phone

Subject

Address

ENVIRONMENTAL ANALYSIS WEEKLY HIGHLIGHTS WEEK ENDING SEPTEMBER 28, 1979

PROBLEMS

Air Sampler Filter Pickup Support-CJB, RWH
Site Survey monitors are not doing their job. Special and
routine air sampler filter pickup schedules were missed several
times this week

Surface Water Control Project-RWH

On Friday, September 21, the contractor for the Surface Water
Control Project was found scraping top soil in an area that had
not been scarified near the C-2 dam. The operation was stopped
immediately. Air sampler results did not show any airborne
TLLa activity. On Monday, the area was covered with new top soil

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ACCOMPLISHMENTS

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Information Exchange Meeting-CJB
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Plant Wide Radiometric Survey-RWH
A total of 30,000 square feet was radiometrically surveyed this week. No hot spots were found.

Rockwell, 1979b

T. R. Crites Page 2 September 28, 1979

INFORMATION

Reviews-CJB, RWH

A total of seven Federal Registers and five construction projects were reviewed this week for environmental concerns.

Sewage Sludge Removal Procedure-CJB
In the past, airborne dust has been a perpetual problem during sludge removal. Therefore, at the request of the Environmental Analysis Group, Solid Waste Management has prepared a draft procedure for sewage sludge removal. We have reviewed this procedure and provided changes which will ensure appropriate environmental controls for this operation.

EPA Conference on PCB's-DFH
On September 25, Don Haumann attended an EPA conference on PCB's.

Quality Plan-CAK
The Environmental Analysis Group Quality Plan has been final proofed and typed and submitted for director and plant manager approval.

D. D. Hornbacher

THSS #195

PRODUCT AND HEALTH PHYSICS RESEARCH SERVICE REPORT

Report No:

317-72-174

Title:

Nickel Carbonyl Disposal

Work Requested by:

G. J. Werkema

Date Requested:

March 1972

Work Performed by:

S. H. Pitts, F. D. Hobbs

Manhours:

200

Date Work Started:

March 1972

Date Work Completed: August 1972

Date This Report:

September 1972

Report Written by:

F. D. Hobbs

Distribution:

S. H. Pitts J. E. Hill ్ర్. J. Werkema

Attn: S. E. Hammond

M. A. Thompson IRF (Record)

KWIC Index:

Nickel Carbonyl

Introduction

Approximately 185 pounds of nickel carbonyl (N1(CO)₄) contained in seven 25-pound cylinders, two 5-pound cylinders and one lecture bottle had been stored in the toxic gas storage building over the past several years. Because of the inherent hazards associated with nickel carbonyl, it was desired to dispose of the chemical in an expeditious manner. Several disposal methods were considered with primary emphasis on safety and minimum environmental effects. The hazards associated with the chemical and ultimate disposal method are described in this report.

Conclusions

The nickel carbonyl previously stored in the toxic gas storage building has been safely destroyed. The chemical was drained into a deep "dry well" and allowed to decompose.

Decomposition occurred with a minimum of hazard to individuals involved in the disposal and the environment.

Properties of Nickel Carbonyl

Nickel carbonyl is a colorless liquid with a boiling point of approximately 43°C. The vapors are extremely toxic with suggested limits of 0.001 parts per million average concentration in processing plants. Concentrations of only a few parts per million in air can be very dangerous and appreciable adsorption through the skin has been claimed. (1) The toxic symptoms created by inhalation are believed to be caused by liberation of both nickel and carbon monoxide in the lungs. (2)

In addition to the toxicity, nickel carbonyl has a fire hazard and moderate explosion hazard. Ignition can be spontaneous. (2)

Disposal Procedure

In light of the extreme hazards associated with nickel carbonyl a great deal of consideration was given to any method for its disposal. First of all, it was obvious that disposal had to be performed as far from the populated areas of the plant site as practicable. Secondly, the safety of individuals involved directly with the disposal was a paramount consideration. Thirdly, the maximum allowable concentration of nickel carbonyl in ambient air is only 0.07 ppb. (3)

After numerous proposed disposal methods were rejected for various reasons a rather simple and effective method was devised. A hole approximately fifteen feet deep and three feet in diameter was drilled in a remote area of the plant site. The cylinders containing the chemical were opened and suspended in this "dry well" until they were drained. The chemical and its much heavier than air vapors collected and decomposed in the bottom of the well.

Of course, the procedure was not quite as simple as it sounds. Individuals involved wore supplied air packs and a member of the

Rocky Flats Fire Department supervised the proceedings. The chemical proved to be completely unpredictable. On occasion it ignited immediately after release into the well. At other times the well would remain mysteriously silent for long periods before a muffled ignition occurred.

A minimum of the chemical was released to the air during the disposal procedure. Samples at the lip of the well indicated nickel carbonyl concentrations of approximately 10 parts per million being released during disposal. Rapid dilution with ambient air and the fact that the chemical decomposes in air (4) both reduced any environmental upset.

- (1) F. A. Patty, Industrial Hygiene and Toxicology, Volume II, Toxicology, Interscience Publishers, New York, 1962, Second Edition.
- (2) N. I. Sax, Dangerous Properties of Industrial Materials, Reinhold Book Corporation, New York, 1968, Third Edition.
- (3) "Global Pollution Control Guidelines, The Dow Chemical Company, Fourth Draft, November 12, 1971.
- (4) "Liquid Nickel Carbonyl is Dangerous" Product Bulletin Published by The Matheson Company.



THE DOW CHEMICAL COMPANY

ROCKY FLATS DIVISION
FO SOX SEE
GOLDEN COLORADO 80401

March 29, 1972



J. R. Seed

STATUS REPORT - MARCH 1972 INDUSTRIAL HYGIENE & HEALTH PHYSICS RESEARCH

SECTION G. ECOLOGY

G.1. Health Physics

Personnel Exposures - C. R. Lagerquist

1972 1972

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The name of one employee was added to the "Internal Exposure Index" during Yareh. This was an inhalation case resulting from the explosion of an aerosol spray can in the 771 Building incinerator. Other personnel data for the month of March are tabulated below.

	Wounds		
Time Period	Measured.	Positive After Treatment	Internal Exposu ' Index
March 1972	94.	5	1
FY 1972	881	35	5

Dose Calculations - R. L. Murri

An estimate of the potential radiation hazard resulting from exposure to radioactive noble gases released during a maximum credible accident was calculated. It was assumed that all noble gas fission products plus their respective daughter products escaped the building following an incident which produced 10¹⁹ fissions. The calculated hypothetical dose to an individual at the exclusion fence (1600 meters) due to the passage of the cloud of fission products is of the order of 2 rad. This is within AEC guidelines.



A prime contrac or for the U.S. Atomic Energy Commission CONTRACT AT(29-1) 1106

G.2. Industrial Hygiene

Effluent Monitoring - J. E. Hill

Adjustments to the 883 effluent scrubber have resulted in substantially reduced concentrations of nitric acid vapors in the effluent stream. Nitric acid concentrations downstream of the new scrubber averaged 8 parts per million (14 parts per million maximum) during March. It appears that adequate control has been achieved, and subsequent reports will be by exception.

Air Quality Standards - F. D. Hobbs

A review and compilation of air quality standards set forth by the Environmental Protection Agency, the United States Atomic Energy Commission, the State of Colorado, Jefferson County, and Dow Chemical U.S.A. has been completed. Part I of the compilation describes the standards for various air pollutants as set forth by each of the controlling agencies. Part II contains the directives and required sampling techniques.

G.3. Sanitation and Chemical Disposal

-> Nickel Carbonyl Disposal - F. D. Hobbs and S. H. Pitts

Various methods for safe disposal of nickel carbonyl have been tested. Cns method consisted of burning the liquid in a tray while collecting the resulting dense combustion products on a filter. This was judged to be slow and potentially hazardous. Disposal in a dry well (? feet in diameter, 15 feet deep) has been highly successful. Vapors of the compound, being denser than air, reside at the bottom of the well and either decompose on the walls of the well or mix slowly with air with consequent burning. The rate of burning can be controlled by moving a cover plate over the well. Combustion products collect on the sides and bottom of the well.

The behavior of nickel carbonyl is unpredictable. It can burn spontaneously, although ignition is not always immediate. Operators handling the material outside of a sealed gas transfer system should wear supplied air masks and should be prepared for spontaneous ignition of spills.

Control of Food Serving Areas - A. H. Voight

Considerable traffic behind the steam table and serving area in Building 771 resulted in radioactive contamination of the floor up to 700 d/m ft². The building superintendent was notified by letter that corrections were needed. Shortly thereafter, footprints were found on the preparation table. Although there was no radioactive contamination, conditions in the Building 771 cafeteen are clearly unacceptable. These conditions appear to result from problems in industrial relations or industrial psychology rather than from any abstracted sanitation consideration.

G.4. Environmental Assay

Particle Size Analysis - J. A. Hayden

Alpha Track Nethod

The sizes of several radioactive particles collected on an outdoor air filter were calculated using Leary's autoradiographic technique. Values for particles of $\Gamma u O_0$ were found to be 0.16 - 0.19 microns (u) in agreement with values reported by Trapelo/West (0.13 - 0.15] median range). Outdoor air filters may also collect particles of carnotite $(K_2O \cdot U_2O_3 \cdot V_2O_5 \cdot 3H_2O)$, a naturally occurring neral found in this area. These particles also produce alpha tracks in film, and could cause uncertainty in the interpretation of autoradiograms. To resolve the uncertainty, an autoradiogram of a particle of pure U_3O_8 was prepared. A readily apparent difference between uranium and plutonium oxide particle autoradiograms was found.

Fission Track Method

a. Fission tracks were obtained by exposing mica to aquaeous solutions containing varying concentrations of plutonium. A semi logarithmic plot of concentration vs number of tracks per unit area yields a straight line between values of 0.09 and 0.35 d/min cm³. The technique could develop into a valuable analytical tool for analysis of pond and reservoir water.

b. Fission tracks were produced in Lexan a polycarbonate by exposure to a gelled aquaeous medium containing known PuO₂ particles. Comparison of this radiogram with those produced by exposure to aquaeous plutonium solutions shows clearly that a particle in suspension can be readily differentiated from ions in solution in the same medium. This is an important achievement, for it provides the first means to establish the physical nature (particle or ion) of plutonium in the aquatic environment.

Operation Prairie Dog - D. E. Michels

Twelve animals were captured and relocated at Rocky Flats on March 9 and 10. Positive identification of ten of the relocated animals was made in the vicinity of the original emplacement on March 16. An increase in the local predator population has been noted, with sightings of coyotes, badgers, and hawks. No evidence of successful predation has been observed, however, "Operation Prairie Dog" was conducted with the participation of students from Alameda High School. Future activities of this kind should include similar participation whenever possible.

G.5. Building 774 Release

Due to an inadvertant relates of liquid raste from Bldg. 774, Ponds 2 through = (2-1 through E-4) and Walnut Creek at Indiana we a scroled trice daily from Earch 9, 1072 to earch 23, 1972 and once daily through Earch 23, 1972. Tifty-ml. samples were analyzed by liquid scintellation spectrometry. This analysis provides rapid answers (less than 24 hours) but does not afford the precision of the routine method on 7-liter samples. Summary of results:

	Low	High	~ 500921
Pond 2 Pond 3 Pond 4 Pond 5 Walnut Creek	9. pCi/l 22. " 17. " Bkgd " Bkgd "	140. pCi/l 75. " 95. " 45. " 68. "	350 K
at Indiana	•		124

25

G.6. Laboratory Productivity

A summary of analyses reported during the previous 6-month period is attached.

Publications

Journal Articles	0
RFP Reports	0
Internal Reports	0
Service Reports	3
Speeches	1

Service Reports

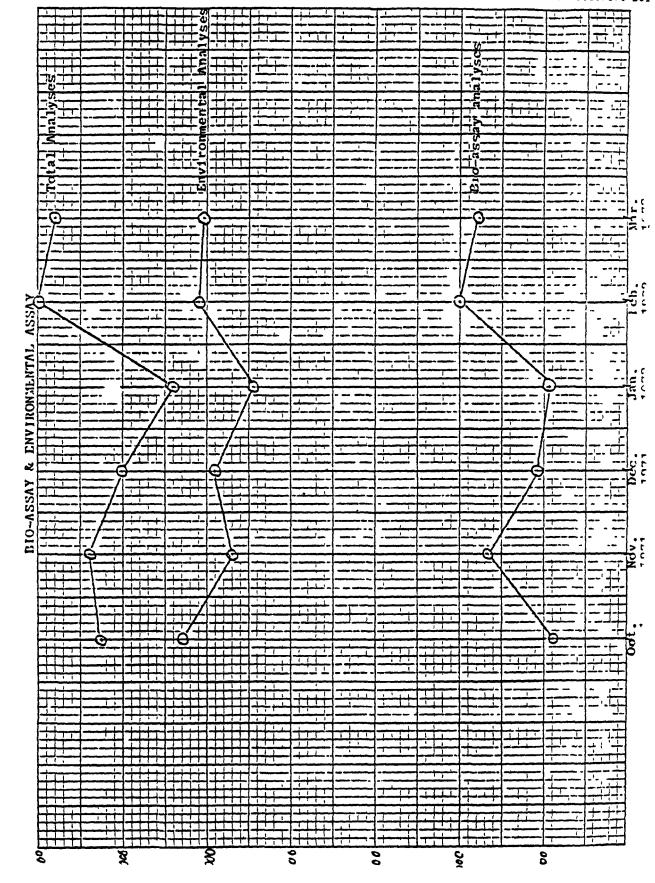
- J. A. Hayden, "Analysis of Particles Collected Near the Incinerator During a Contamination Incident," Service Report No. 317-72-126, March 14, 1972.
- F. D. Hobbs, "Lithium Hydride and Lithium Deuteride Disposal," Service Report No. 317-72-123, March 1, 1972.
- D. E. Michels, "Investigation of Contamination in 776 Alley." Service Report No. 317-72-128, March 16, 1972.
- G. J. Werkema, "Between the Risk of Radiation and the Prospect of Peace," Arvada Morning Optimists Club, March 29, 1972.

S. E. Hammond

Industrial Hygiene Mgr.

SEH:gc

W. Piltingsrud



91HRRØ14

36. O1160

P HONE TO LEAST TO TO THE TANK THE TANK

B 00003081

IHSS #195, 196, 197



RF-0255

CEARP Phase I Interview Notes

Rocky Flats Flant

REVISED WITH RF COMMENTS ON APRIL 16, 1985
ALL EARLIER VERSIONS CONTAIN SIGNIFICANT ERRORS

ьу ,

Kenneth Rea, Roger Ferenbaugh, and Lew Walker

Bld 801 - Solund out dans a rlung and,
Blk- 991 - Owerde shall ease

Fage - 1

A CONTRACTOR OF THE PROPERTY O

oil is placed into storage for shipment to an approved FCG disposal facility.

Earlier operations - From the beginning of plant operations, all large transformers at Rocky Flats have been diked, and no major leaks have occurred. No early records exist on replacement of small transformers or capacitors nor on what types of oil these transformers or capacitors may have contained. These items may have been placed into the scrap metal site west of Building 359.

(DOUBTFUL SINCE NONE WERE FOUND DURING THE EXCAVATION IN 1981.)

PCB disposal. - There are no known incidents of fires with PEB at Rocky Flats. In earlier years, small quantities of PCB oil could have possibly been destroyed at the Oil Burn Pits: however, no documentation exists.

FCB spill. - In 1983, there was a small (2 to 3 gallon) (NOT SD, MAY BE A HALF PINT) spill of PCB oil in the visitor a parking lot located next to the east guard gate. The incident occurred when a transformer tipped over in the bed of a truck belonging to an outside contractor coming into the plant. The spill was cleaned up by removing and replacing the PCB contaminated pavement.

EPA/FCB - In the late 1970s, Rocky Flats was asked by the EPA to assist with the removal of 17 drums of PCB from a farm in Lafayette. The material was located during the investigation of a reported PCB contamination incident involving a nursing infant.

Working Notes - CEARP Phase 1

Fage - 14

MANAGER STREET, STREET

Eurlding 122. - The sump in this building may contain low level radioactive contamination. This sump collects the rinse water from decontamination. (RF COMMENT - NO. WASTE WENT OUTSIDE INIO AN ABOVE GROUND STORAGE TANK)

C. 123 Building - Health Physics

Building 123. — There may be low level radioactive contamination from both plutonium and uranium under and around Building 123. The building previously drained into a sump (tank outside building?) and the liquid is then pumped into a different* waste line. There is the potential for leakage from this system. Picric acid is used in Building 123. (RF COMMENT - STILL?)

Around Building 123. - There have been several small spills of nitrate wastes around the outside of this building. (RF COMMENT - WHAT WAS SPILLED? URINE?)

D. 124 Building - Water Treatment Plant

124 Building. - Backwash went to a pond on the south side of Building 124 and may have drained into Woman Creek.

Working Notes - CEARP Fhase 1

Fage - 24

Under Eurlding 559 - There was a break in a pyrex waste line under the slab-on-grade. A new waste line was installed above grade; however, some contamination may exist under the slab. The broken waste line would have contained plutonium, uranium, and nitrates. An incident report should exist in the Environmental Master File.

Building 559 and Building 774 - Both Building 559 and Building 774 are suspect for radioactive contamination in their footing drains.

West of Building 559 - During the excavation for the Fersonnel Security Zone, a non-radioactive waste disposal site was uncovered at this location. This site contained some classified metal shapes (RF COMMENT - DOUBT THIS). The material unearthed consisted of machine turnings, rings, shapes, overlays, and other metal parts; the material was moist but not only. The burial probably occurred in the early 1960s. The recovered material is now located in a small pile next to Valve Vault 11, west of Building 559, and east of the Nitrogen Plant. (RF COMMENT - NO, ITS IN THE LANDFILL)

Near Building 559 - There was a scrap metal disposal site at this location, west of Building 559 and northwest of the other site uncovered during the construction of the PSZ, that contained building construction debris from early plant construction. This site was probably used by the Austin Company (contractors). There

Working Notes - CEARP Fhase 1

Fage - 15

Trench surface cover - At the time the trenches were closed, each trench was covered with 2 to 3 feet of soil. There are eleven identified frenches in this general location near the east guard gate. [John Epp may be a good source for information about the trenches].

Trenches in general. - Many trenches were used in the early days of Plant operation and could contain a variety of materials.

D. Lindsay Ranch Road

Lindsay Ranch Road; nickel carbonyl — Several bottles of nickel carbonyl were destroyed in a hole drilled beside the Lindsay Ranch Road. (RF COMMENT — SOUTH OF THE LINDSAY RANCH). (The hole was located about 100 feet before the drop into the first draw approaching the ranchsite from the south.) The hole was 4 feet in diameter and about 20 feet deep. The valves were cracked open on the cylinders and the cylinders were lowered into the hole with ropes. After 24 hours, the cylinders were removed from the hole, vented by small arms fire, and buried in the landfill. Two cylinders got stuck in the hole and were buried in place.

Page - HI

Internal Letter

IHSS #197

Date September 4, 1981

TO T. R. Crites

Address

N.

1700483

D. D. Hornbacher

Rockwell International

FROM Address

Phone

Subject ENVIRONMENTAL ANALYSIS WEEKLY HIGHLIGHTS WEEK ENDING SEPTEMBER 4. 1981

PROBLEMS

→ PSZ Construction-CTI, RWH
Excavation for the PSZ unearthed an old burial site immediately west of Building 559. This site was previously identified as a scrap metal disposal area in 1958. The material will be removed.

monitored for radioactivity and disposed either in the sanitary landfill or in radioactive waste containers.

Buffer Zone Control-RWH

HS&E Laboratory technicians have been observed driving off road in the buffer zone while collecting water samples. They have been advised to stay on approved roads.

Sediment in Pond B-5 Discharge-RLH

During a routine discharge of Pond B-5, high sediment content was observed. This indicates that sediment may have accumulated above the sediment control standpipe. After the discharge is completed, it will be determined if dredging is necessary.

Ambient Air Samplers-CJB

Air sampler S-21 has been out of service for approximately a week due to damage done to electrical service by construction contractor personnel. Because of new asphalt, Maintenance cannot get into the area to restore service. Air samplers S-4, S-5 and S-22 should provide adequate sampling in the interim period.

Ureabor Application-CTI

Application of ureabor sterilant to ground areas along Central Avenue was accidentally extended to the areas surrounding decorative spruce trees. After the accident was recognized, attempts were made to remove the ureabor. The success of this action will be visible if the trees remain green.

MAAM Van-RJC

Startup of the MAAM van continues to be a problem. One of the air conditioners is not operating properly, the ozone analyzer gain controls are peaking out during upscale voltage checks, and the calibration system cannot be used until parts that have been ordered are received.

T. R Crites Page 2 September 4, 1981

ACCOMPLISHMENTS

Total Suspended Particulate Sampling-RJC
The calibration orifice for field calibration of a total suspended particulate (TSP) air sampler has been calibrated by the EPA. The TSP program should begin within about two weeks.

Reports and Procedures-CJB
Procedure EA-ERP-3 (formerly EA-ERP-1) ARAC Capability, was revised and distributed. Status of EA Section reports since the new review system was initiated is as follows: 3 distributed, one ready for distribution, 2 awaiting peer review, 3 awaiting management review.

INFORMATION

MAAM Van Quality Plan-RJC Work is continuing to prepare operational manuals that include quality assurance procedures for each instrument in the MAAM van.

Hydrologic Test Hole Data-NDH
Peer review of a historical hydrologic test hole data report has been completed and appropriate comments are being included in the report. Also, a computer file has been created for the test hole data.

Rocky Flats Blue Ribbon Committee Activities-CTI
C. T. Illsley attended the Rocky Flats Blue Ribbon Committee Public Meeting that was held in Broomfield this week. He responded to questions in regard to the Geologic/Seismologic report.

Ambient Air Concentrations-CJB

Air sampler S-B has shown a dramatic drop in plutonium concentration from 135 d/m per sample for the time period 7/13 to 7/27 to 11 d/m per sample for the time period 7/27 - 8/10. The first application of Coherex was done on July 17.

Maintenance Activities in Plenum FU-2B, Bldg. 771-JMW
Major maintenance and repair work on the filter frames in Plenum
FU-2B, Building 771 are required because of corrosion from acid
fumes. Environmental Analysis has been involved in the initial
planning phase for the maintenance and repair work and will continue
to monitor the work for environmental concerns.

D. D. Hornbacher

IHSS #197

Internal Letter

Rockwell International

1700482

TO

Date

September 11, 1981

Address

T. R. Crites

Address

FROM D. D. Hornbacher

Phone

Subject

ENVIRONMENTAL ANALYSIS WEEKLY HIGHLIGHTS WEEK ENDING SEPTEMBER 11. 1981

PROBLEMS

ARAC System-JLZ

The ARAC system is partially functional since receipt of a new software tape from LLL. Tower data are being received and transmitted to LLL and communications can be established. The video screen is still not functional. One-half of the necessary power transistors on order have been received the remainder are still on back order.

Weather Tower Upgrade-JMW

Strong interference signals from the temperature probe aspirator motors are causing problems with the temperature measurement signals. Conduit may have to be installed on the tower to isolate the aspirator motor lines from the rest of the cables.

Nitrate Irrigation Water-CTI

Samples of nitrate irrigation water were collected in July to obtain baseline analytical data. Two of four samples have yielded unacceptable radionuclide data. Another sample has been collected to resolve discrepancies.

ACCOMPLISHMENTS

Inventory of Records-CJB

The FY 1981 records inventory and cleanout was performed for the EA Section and the summary report was submitted on time.

Total Suspended Particulate Sampling Program-RJC The final draft of Total Suspended Particulates (TSP) standard operating procedures and Quality Assurance manual has been developed and will be submitted for typing next week. All TSP data collected at the Rocky Flats monitoring network will be corrected to the standard reference conditions and the methodology will be consistent with procedures developed by EPA Region VIII The target date to begin sampling is September 28, 1981. Sampling will follow the national 6-day sampling schedule after this date

MX Missile Program-CTI

A response was prepared for Rockwell Facility Design on the question of additional NEPA documentation required for equipment installation in support of the MX Missile Program. A letter has been sent to Facility Design that states that the existing Rocky Flats FEIS should be adequate according to DOE regulations.

Rockwell, 1981b

T. R Crites
Page 2
September 11, 1981

Computer Support-JLZ

1. Industrial Safety is planning to purchase a Compustar computer terminal. In support of this activity, an ADP requirements and check list has been completed for submission to Management Systems for approval.

2. Text editing (word processing) software has been received and installed on the Environmental Sciences terminals. This software enables the user to compose and store reports, letters and other text on floppy disks for later retrieval, editing and printing.

INFORMATION

Weather Data Summarization Software-JMW

A software package to summarize weather data will be needed upon completion of the data acquisition system. A meeting was conducted with Analytical Systems to determine feasibility and to define the scope of the prospect. The current plan is for Analytical Systems to provide the software on the RFP central computer beginning in CY 1982.

Status of Reports and Procedures-CJB Une procedure, EA-ERP-3, ARAC Capability, was issued, four reports and one procedure awaiting EA management review, one report under peer review and one report receiving author revision.

PSZ Trench Removal-CJB, RWH
On September 9, work began to remove the buried material from a trench located in the PSZ near Building 559. No contaminated materials have been found thus far and all the material is being hauled to the landfill. Total long lived alpha concentrations from three portable air samplers run at the 559 cleanup area on September 4 showed zero count.

Ground Water Monitoring-CTI, NDH
A request was received from DOE to prepare before November 16 documents describing the Rocky Flats groundwater monitoring program. These documents are required by the RCRA program administered by EPA. Both the evaporating ponds and process waste ponds are considered surface impoundments of hazardous wastes and require monitoring wells and testing programs.

NO₃ Measurements in Westminster Water Supply-RLH, CTI The erratic nitrate concentrations in Westminster raw water persists with an increase to 4.4 mg/l on September 3. Daily samples collected this week all contained low concentrations (less than 0.5 mg/l). The source of the erratic data is still being pursued. A meeting was held with the Westminster Chief Chemist to discuss possible sources for nitrates.

D. D. Hornbacher

IBSS #197 Internal Letter

Date

TO

Address



Rockwell International

No

FROM

T. R. Crites Bldg. 123

Phone

Address

X4098

Subject

FOURTH QUARTER. FY 81. ACCOMPLISHMENTS

October 2, 1981

R. E. Yoder

Bldg. 111

The following accomplishments were noted during the quarter ending September 30, 1981:

- ARAC was switched over to new LLNL software and the meteorological tower was refurbished with new instruments and tied into the building via light pipe connections.
- 2. The long-range site clean-up priorities were evaluated and reviewed with RFAO for concurrence.
- → 3. An old scrap metal burial area west of building 559 was cleaned out and properly disposed of.
 - 4. The exhaust HEPA filter loading study made significant progress: measurement methods were tested out on FU-28 second stage filters and samples obtained from building 771 main final stage filters
 - 5. Food stuffs were collected and agreements established for analysis to meet CDH request.
 - A summer student project to determine air flow rates as a function of time in our ambient air samples-completed.
 - 7. The EML samplers were upgraded and EML #1 shut down for some indefinite time period.
 - 8. A spill prevention and control committee was established, charter drafted, and procedures initiated in compliance with the NPDES permit.
 - CSU completed a wind tunnel study of the Sierra impactor collection efficiency.

Creter, Ti

Rockwell, 1981c

The second secon

R. E. Yoder October 2, 1981 Page 2

- 10. The EG&G plant site photos were obtained.
- Considerable progress was made in establishing EPA acceptable calibrations to MAAM van instrumentation.

Bur Cho-

T. R. Crites

TRC/ja
Distribution:
D. D. Hornbacher
D. C. Hunt

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Joternal Letter

IHSS #197

December 19, 1978

M. Y. Werkema

Rockwell International

1500887

FROM Address C. T. Illsley

Phone

Subject

TO

Address

BRIEFING ON BURIAL TRENCHES

On Friday, December 15, 1978, I attended a meeting in the DOE Conference Room with the following people in attendance:

Robert D. Smith NRC Ray Miller DOE, ALO Tom Bosworth Gary Echert DOE, RFAO

At the request of DOE. I gave a brief overview of the location and contents of the burial trenches on-site at Rocky Flats. The material was read from the attached discussion originally written by E. A. Putzier in 1972. A copy of this report and an earlier report should be in the EMF. A map showing trench locations previously prepared for the Lawsuit Tour was handed out at the meeting. No copies of my written briefing was given to attendees.

The same information is presented in the Rocky Flats Radioactive Waste Management Plan, 1978. A copy was reportedly sent to NRC by DDE.

rich per

Environmental Analysis and Control

CTI:mmk

cc:

D. D. Hornbacher

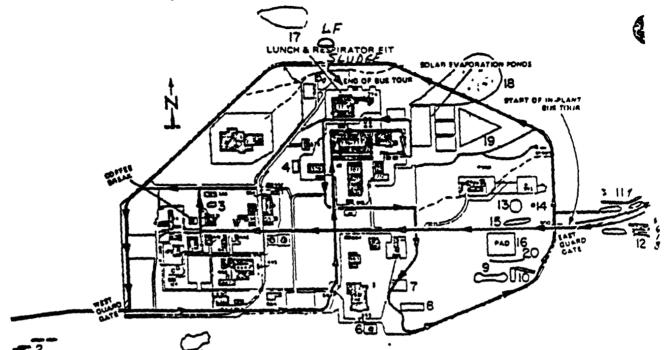
R. E. Yoder

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Den 60-13370-RR-001

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Rocky Flats Plant ON SITE EXTERIOR TOUR



Map 11 AEC-approved Burial Sices

on Map 12. Further research has revealed that the soil and asphalt disposal areas (east of 881) are actually in the same location. The soil was deposited on top of the asphalt - the location is about halfway between the two as shown on Map 11.00

Oil Burning Pit No. 1. Ten drum of oil containing depleted uranium were burned in August 1956 and the residue covered with backfull.

Oil Burning Pit No. 2. (1957, 1961-1965) Total 1082 drums of oil containing uranium burned. The residues (and some flationed drums) were covered with backfill.

Mound Area. (1954-1958) Total 1405 drums oil and solid waste.

Mostly depleted uranium with some enriched uranium and possibly extremely low-level plutonium. Complete retrieval (for offsite disposal) achieved May 1970. Samples were taken in the vicinity of burial site to determine levels in the location of a proposed holding pond. Results, as indicated on Map 8, are thought to be more due to infiltration from the 903 Area rather than to an influence from the burial sites or oil disposal pit (No. 2).

Oil Drum Storage Field. (1958-1967) 3572 drums of oil from plutonium process areas and 1254 drums of oil from uranium process areas stored in this location until removal completed in June 1968. Leakage from drums deposited multi-Curie amounts of plutonium and uranium in soil. A 98,000 square foot area covered with an asphalt cap (completed November 1969) to contain the material until a safe disposal method can be developed and the AEC has determined an appropriate disposal site. (See Section I.)

Trench T-1. (1954-1962) Approximately 25,000 kg of depleted uranium chips in drums were deposited in this trench and covered with about 2 feet of fill dirt.

Trenches T-2 through T-8. (1954-1968) Disposal site for approximately 100,000 kg sanitary sewage sludge. Earlier pits involve mostly uranium with an increasing plutonium fraction in later pits. Activity ranges from 800 to 8000 dpm/gram. T-4 also contains some uranium plutonium infiltrated asphalt planking from the 207 ponds. Estimated total alpha radioactivity is between 100 and 150 mCi.

B 00014602

Asphalt Disposal Area. (1969) Approximately 320 tons of plutonium-infiltrated asphalt and soil (from the 776 fire, May 1969) buried under 1 to 2 feet fill dirt. Less than 1 mCi plutonium is estimated to be dispersed in approximately 250 cubic yards of material, with an estimated alpha activity about 7 dpm/gram.

1

Soil Burial. (1972) Approximately 60 cubic yards of plutonium-infiltrated soil from the 774 waste storage-tank area, now covered with about 3 feet of fill dirt. Estimated activity less than 250 dpm/gram (total long-lived alpha).

Incinerator Ash Pits (I-1 through I-4). (1952-1968) Estimated 100 grams depleted uranium burned with general combustible waste over 16-year period. Ashes buried in trenches.

Original Sanitary Landfill. (1952-1968) Former sanitary landfill area. Estimated 20 kg depleted uranium ash (60 kg inadvertently burned, approximately 40 kg recovered) buried along with normal plant waste, including small quantities of various surplus chemicals.

Oil Disposal Pit. (1958) Approximately 30 to 50 drums of oil sludge from a storage tank cleanout were emptied into a pit, which was then backfilled. No radioactivity involved.

Sanitary Landfill. (Started in 1968) From August 1968 to
February 1970, approximately 1000 kg sanitary sewage sludge
(800 to 8000 dpm/gram) were buried in landfill. (Estimated
total of 1 to 1.5 mCi alpha radioactivity buried with sludge.)
Estimated annual (Dow/Contractor) waste is 9,000,000 pounds.
Materials with less-than-minimum-detectable (smear or direct
count) radioactivity levels (500 dpm/60 square centimeters direct,
or 50 dpm/square foot smear) are accepted for burial. Recent
surveys have also disclosed other radioisotopes (e.g., tritium)
in small quantities.

Lithium Destruction Areas. (1956-1970) Approximately 400 to 500 pounds of metallic lithium were destroyed and the residues (primarily nontoxic lithium carbonate) buried. Smaller quantities of other reactive metals - sodium, calcium, magnesium - and some solvent -type chemical compounds were also destroyed in this location.

Scrap Metal Disposal. (Approximately 1958) Scrap metal components, mostly from original construction. Although no detectable radioactive or chemical materials were observed, some pieces were recovered from process areas. Hence, minute radioactivity of a small percentage is possible.

Cooling Tower Blowdown Retention Ponds. (Small ponds used to contain cooling tower waters.) Hexavalent chromium (used to inhibit corrosion) is present. Some small quantity of lithium was also destroyed in the two eastern-most ponds. These ponds were covered with fill.

R 99914695

160105+

lejnomnorivno Ysoleovni

A HISTORICAL SUMMATION OF ENVIRONMENTAL INCIDENTS AFFECTING SOILS AT OR NEAR THE U.S.AEC ROCKY FLATS PLANT.

Jan 29, 1974

DRAFT

PP 72

DOES NOT CONTAIN
OFFICIAL USE ONLY INFORMATION
Ame/Org: FMC30 Classin pate/0 2808



ROCKY FLATS DIVISION DOW CHEMICAL USA

ONLY

Scrap Netal Disposal (Approximately 1958)

Scrap metal components, mostly from original construction, were buried in this area. Although no detectable radioactive or chemical materials were observed, some pieces were recovered from process areas and low level radioactivity of a small percentage of the scrap is possible

(F)

Cooling Tower Blowdown Retention Ponas

These are small ponds which were used to contain water from cooling towers. Remarkable thromium is present. Some small quantity of lithium was also destroyed in the two eastern-most ponds. These ponds were covered with fill.



Mnn 15 (Other Areas)

In addition to the noted areas, some potential for minor chemical infiltration exists in the vicinity of various storage and holding tanks (Map 15). This potential is, in most cases, extremely slight, particularly in those locations where tanks are diked. In the past, before diking was installed, minor spills have occurred and have been discussed in conjunction with the sectional maps.

Nap 15A shows the approximate location where empty bottles of nickel carbonyl were buried after the nickel carbonyl was destroyed. The gas was destroyed by burning (during the 1957 fire in Building 771 or when ready for discard). Explosive charges were used to destructively vent the cylinders and ignite any residual gas. No known infiltration or affective residues were generated during these operations or as a result of the burials.

APPENDIX B GROUND WATER QUALITY DATA

Station NumberP218089

Page 6	00001	Date 06/16/92										
LOCATI	D	PROJ_SAM_NO	CHEMICAL	RESULT	UNIT	ERR	QUAL.	DTIMIL	VA		SAM_DA	
P218089	TRG	GW01410FT	1,1,1 TRICHLOROETHANE	5	UG/L		U	5		VOCCLET		
P218089	TRG	CP0389 0406	111 TRICHLOROETHANE	6	UG/KG		U	6	A	RPVO	01-NOV-4	
P218089	TRG	GW02716TT	111 TRICHLOROETHANE	5	UG/L		U	5		VOCCLPT		
P218089	TRG	GW02518IT	111 TRICHLOROETHANE	5	UG/L		U	5		VOCCLPT		
P218089	TRG	OP03890204	1 1,1 TRICHLOROETHANE	6	UG/KG		U	6	A	RPVO	01-NOV-8	
P218089	TRG	CP03890002	1,1 1 TRICHLOROETHANE	6	UG/KG		U	6	A	RPVO	OI-NOV-	
P218089	TRG	OP03890608	111 TRICHLOROETHANE	6	UG/KG		U	6	A	RPVO	01-NOV-\$	
P218089	TRG	OP036908 10	1 1,1 TRICHLOROETHANE	6	UG/G		U	6		RPVO	01-NOV-8	
P218089	TRG	GW02716TT	1 1,2,2-TETRACHLOROETH	5	UG/L		U	5		VOCCLPT		
P218089	TRO	GW01410FT	1,1,2,2-TETRACHLOROETH	5	UG/L		U	5		VOCCLPT		
P218089	TRG	OP03890204	1 1,2,2-TETRACHLOROETH	6	UG/KG		U	6	A	RPVO	01 NOV-	
P218089	TRG	OP03890608	1 1,2,2 TETRACHLOROETH	6	UG/KG		U	6	A	rpvo	01 NOV-8	REAL
P218089	TRG	OP03890002	1 1,2,2-TETRACHLOROETH	6	UG/KG		U	6	A	RPVO	01 NOV-8	
P218089	TRG	OP03890406	1 1,2,2-TETRACHLOROETH	6	UG/KG		U	6	A	RPVO	01 NOV-E	
P218089	TRG	OP038908 10	1,1,2,2-TETRACHLOROETH	6	UG/G		U	6		RPVO	01 NOV-8	
P218089	TRG	GW0271 GTT	1,1,2-TRICHLOROETHANE	5	UG/L		U	5		VOCCLPT	21-AFR-92	REAL
P218089	TRG	GW02518TT	1 1,2-TRICHLOROETHANE	5	UG/L		U	5		VOCCLPT	27-PEB-92	REAL
P218089	TRG	GW01410FT	1 1,2-TRICHLOROETHANE	5	UG/L		U	5		VOCCLPT	12-JUN 91	REAL
P218089	TRG	OP03890002	1 1,2-TRICHLOROETHANE	6	UG/KG		U	6	A		OI NOV-S	
P218089	TRG	OP03890608	1 1,2-TRICHLOROETHANE	6	UG/KG		U	6	A		01 NOV-	
P218089	TRG	OP03690610	1,1,2-TRICHLOROETHANE	6	UG/G		U	6		RPVO	OI NOV-	REAL
P218089	TRG	OP03890406	1 1,2-TRICHLOROETHANE	6	UG/KG		U	6	A	RPVO	01 NOV-8	REAL
P218089	TRG	QP03890204	1 1,2 TRICHLOROETHANE	6	UG/KG		U	6	٨	RPVO	9-YON 10	REAL
P218089	TRG	GW02716TT	TRICHLOROETHENE	5	UG/L		U	5		VOCCLPT		
P218089	TRG	GW02518IT	TRUCHLOROETHENE	5	UG/L		บ	5		VOCCLPT		
P218089	TRG	GW02716TT	TRICHLOROETHENE	5	UG/L		U	5		VOCCLPT	21 APR-92	REAL
P218089		OP-0389-0529-02-1300	TRITIUM	110	PCI/L 19	0		400		TRADS	31-MAY-90	٥
P218089	TRG	GW01410FT	TRITIUM	369 6	PCIAL 19		,	400			12-JUN 91	
P218089	TRG	GW01714TT	TRITIUM	363.3	PCIAL 21	0	J	400		DRADS	26-AUG-9	REAL
P218089		OP-0389-0529-02-1300	TRITIUM	110	PCI/L 19	0		400		TRADS	31 MAY-91	0
P218089	TRG	GW01410FT	TRITIUM	369 .6	PCI/L 19		3	400			12JUN 91	
P218089	TRG	GW01714IT	TRITIUM	363.3	PCI/L 21	0	3	400			26-AUG-9	
P218089		OP-0389-0529-02-1300	TRITIUM	110	PCI/L 19	0		400		TRADS	31 MAY-M	Ò
P218089	TRG	GW01410FT	TRITIUM	369.6	PCI/L 19	7	3	400		DRADS	12-JUN 91	REAL
P218089	TRG	GW01714FT	TRITIUM	383.3	PCI/L 21	0	J	400		DRADS	26-AUG-9	REAL

APPENDIX C SURFACE WATER QUALITY DATA

Station Number B4 (Pond B-4)

4 VRESUL VUNIT. VQUAL VDET		
1	E	
7	23	2
-	8	F
D LEMIT VAL	> 280	A 004
R OAUL	700	137 1
T EP	7	=
1.	129 PCI	8
E RESU	=	S
CHEMICAL NAM	TRITIUM	MULLIN
M RES TY TO CODE	DRADS	TRG DRADS
RES 1	Ę	TRO
٦	z	z
IVA	PSO417WC 15 MIL-9	NPS0352WC 14 MAY-9
	NP50417	NP50352
OCTYPE SAM NO DATE	REAL	REAL
LOCAII ST	N N	AS.
1000	3	2

Station Number B4 (Pond B-4)

Page # 00001 Date 06/15/92

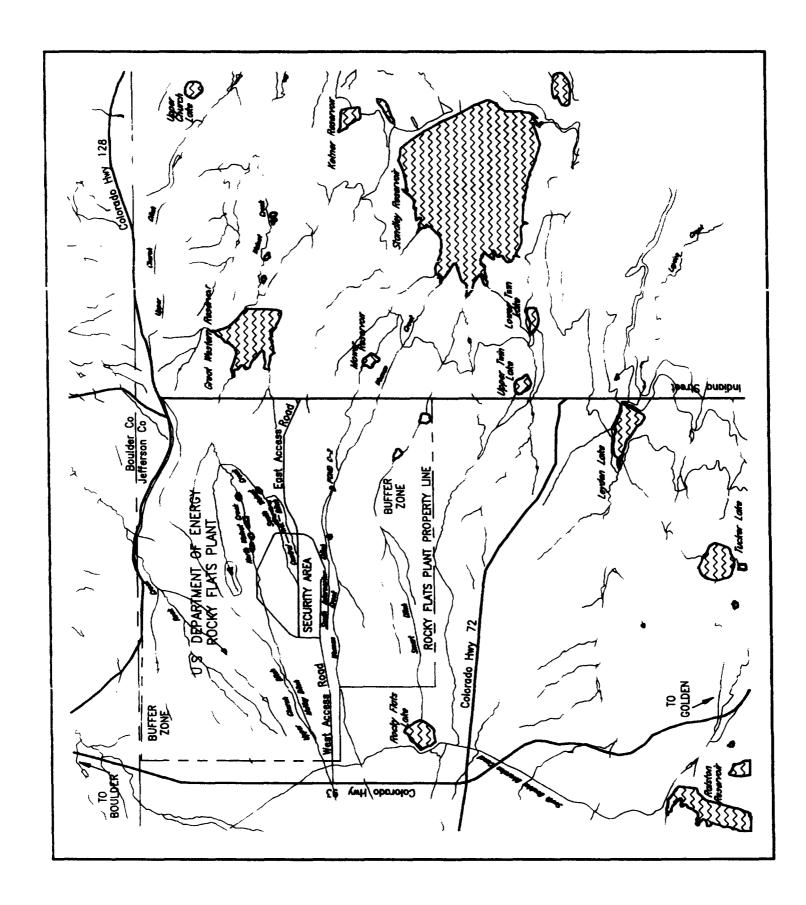
100	ATI	PROJ SAM	CHEMICAL	RESULT	UNIT	ERR	QUAL.	DLIMIT VA	GROUPS SAM DAT OC
84	T	NP50390WC	TRITTUM	1804	PCI/L	194	j	400	DRADS 12-JUN 91 REAL
34	T	NP50460WC	TRITIUM	29	PCVL	250	บ	410	TRADS 11 SEP 91 REAL
14	T	NP50352WC	TRITTUM	93.69	PCI/L	197	J	400 V	DRADS 14-MAY-91 REAL
34	T	NP50417WC	TRITTUM	1729	PCI/L	202	j	400	DRADS 15-JUL-91 REAL
24	T	10750441WC	TRITIUM	100	PCI/L	140	U	240	TRADS 19-AUG-91 REAL

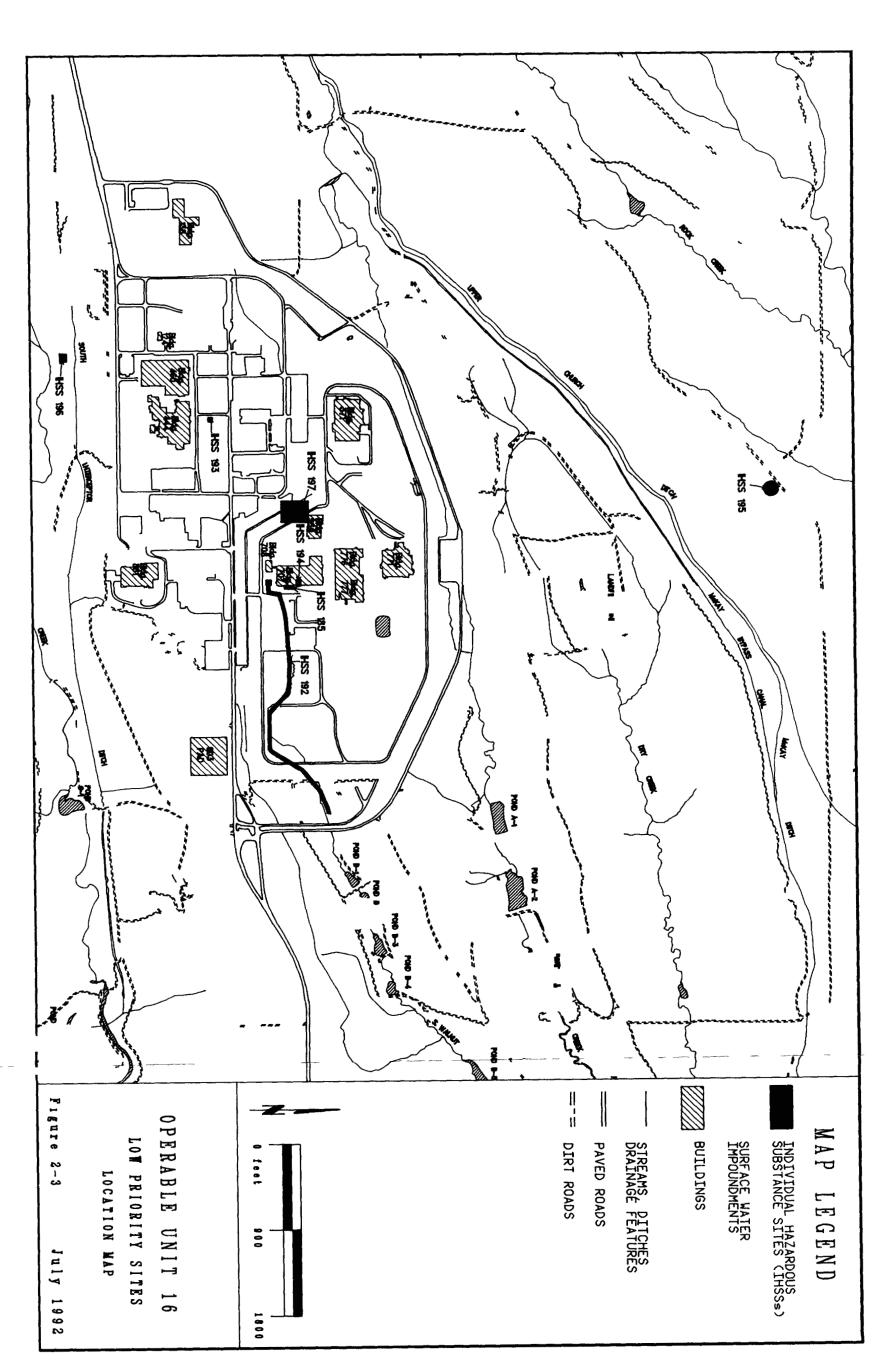
July 1992

and Vicinit

Location M Rocky Flats







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